



Symplexity Promotion of Access to Information Act (“PAIA”) Manual

Version 1.0

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1. Right of Access to Information

1.1 Introduction

1.1.1 The 1996 South African Constitution, by providing a statutory right of access on request to any record held by the state as well as access to records held by private bodies, entrenches the fundamental right to information.

The Promotion of Access to Information Act 2 of 2000 (“the Act”), which came into effect on 9 March 2001, seeks to advance the values of transparency and accountability in South Africa and provides the mechanism for requesters to exercise and protect their constitutional right to request access to a record.

1.1.2 The Act establishes the following statutory rights of requesters to any record of a private body if:

- That record is required for the exercise or protection of any of his or her legal rights.
- That requester complies with all the procedural requirements; and
- Access is not refused in terms of any ground referred to in the Act.

1.1.3 In terms of the Act private bodies are required to publish a manual to assist requesters who wish to request access to a record.

1.1.4 In summary, the Manual provides information regarding:

- Contact details of the Information Officer
- Structures and functions of Symplexity
- Subjects and Categories of records that are held by Symplexity; and
- Procedure that needs to be followed and criteria that have to be met by a requester to request access to information.

1.2 Who may request access to information:

1.2.1. The Act provides that a requester is only entitled to access to a record if the record is required for the exercise or protection of a right. Only requests for access to a record, where the requester has satisfied the Information Officer that the record is required to exercise or protect a right, will be considered. A requester may act in different capacities in making a request for a record. This will influence the amount to be charged when a request has been lodged.

1.2.2. Requesters may make a request as:

- A personal requester who requests a record about him/herself;
- an agent requester who requests a record on behalf of someone else with that person's consent and where it is required for the protection of that person's legal right.
- A third-party requester who requests a record about someone else with that person's consent and where it is required for the protection of that person's legal right; and
- A public body who may request a record if:
 - It fulfils the requirements of procedural compliance.
 - The record is required for the exercise or protection of a right; and
 - No grounds for refusal exist.

1.3 Contact Details of the Symplexity Information Officer: Sec 51 (1) (a)

1.3.1. The Managing Director of Symplexity has delegated his powers to the Information Officer below in terms of the Act to handle all requests on Symplexity's behalf and ensure that the requirements of the Act are administered in a fair, objective, and unbiased manner.

Symplexity Contact Details

Information Officer:	Cecile Van Niekerk
Physical Address:	24 Victoria Link Route 21 Corporate Park Irene 0157

Postal Address:	PO BOX 1632 Wingate Park 0153
Telephone	0823417458
E-mail:	cecilen@symplexity.co.za

1.4 Policy with regards to Confidentiality and Access to Information:

1.4.1. Symplexity will protect the confidentiality of information provided to it by third parties, subject to Symplexity's obligations to disclose information in terms of any applicable law or a court order requiring disclosure of the information. If access is requested to a record that contains information about a third party, Symplexity is obliged to attempt to contact this third party to inform them of the request.

1.4.2. This enables the third party the opportunity of responding by either consenting to the access or by providing reasons why the access should be denied. In the event that the third-party furnishing reasons for the support or denial of access, the Information Officer will consider these reasons in determining whether access should be granted, or not.

1.5 Guidance to Requesters on how to use the Act:

1.5.1. Guidelines in terms of section 10 of PAIA that will facilitate ease of use of the Act for Requesters can be obtained from the Information Regulator of South Africa as set out below:

<p>Postal Address: Information Regulator of South Africa P.O Box 31533, Braamfontein, Johannesburg, 2017</p>	<p>Physical Address JD House, 27 Siemens Street, Braamfontein, Johannesburg, 2001</p>
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General enquiries email address: infoereg@justice.gov.za

Complaints can be directed to: complaints.IR@justice.gov.za

The Information Regulator PAIA guide is available at:

<https://justice.gov.za/infoereg/docs.html#docs>

2. Symplexity Structure

2.1 Scope

This Manual has been prepared in respect of Symplexity.

2.2 Symplexity Profile and Structure

Symplexity (Pty) Ltd is a fully integrated real-time Human Resources (HR) and Payroll solution that manages the most complex environments in a simple and comprehensive manner.

The solution includes all functionality required to manage the full life cycle of an employee and includes strategy and planning, recruitment, and selection, develop and counsel, reward and retain, re-deployment and exit management

3. Classes of records

3.1 Automatic Disclosure: Sec 51 (1) (c) – Records automatically available to the Public

No notice has been published in terms of section 52 of the Act.

3.2 Records available in accordance with other legislation – PAIA Sec 51 (1)(d)

3.2.1. Where applicable to its operation, Symplexity also retains Records and documents in terms of legislation listed below for the relevant periods as provided in the applicable legislation. Please note that the Records referred to on the listed legislation below are not exhaustive and as such, each request for access to Record will be treated uniquely with consideration of applicable legislation, procedure, and policy. Records are kept in accordance with such other legislation as applicable which includes, but is not limited to:

EMPLOYEE-EMPLOYER RELATIONSHIP
Basic Conditions of Employment Act, 75 of 1997
Compensation of Occupational Injuries and Diseases Act, 130 of 1993
Employment Equity Act, 55 of 1998
Labour Relations Act, 66 of 1995
Occupational Health and Safety Act, 85 of 1993
Disaster Management Act, 57 of 2002
Unemployment Insurance Act, 63 of 2001
Skills Development Act 97 of 1998
Pension Funds Act, 24 of 1956

REVENUE/ INCOME
Value Added Tax Act, 89 of 1991
Income Tax Act, 58 of 1962
Skills Development Levies Act 9 of 1999
Tax Administration Act, 28 of 2011
Taxation Laws Amendment Act (latest amendment Act)

GENERAL
Broad-Based Black Empowerment Act, 53 of 2003
Companies Act, 71 of 2008
Constitution of the Republic of South Africa Act, 108 of 1996
Copyright Act, 98 of 1978
Competition Act, 89 of 1998
Consumer Protection Act, 68 of 2008
Electronic Communications and Transaction Act, 25 of 2002

3.3 Records held by Symplexity: Sec 51 (1) (e) – Record Subjects and Categories

As part of EOH Holdings Limited group, much of this is handled by Group systems. Symplexity does form part of the EOH group with regards to, and is incorporated in, the following (except where explicitly stated below):

In addition, the information may be classified and grouped according to Records relating to the following subjects and categories. It is also recorded that the accessibility of the documents listed herein below, may be subject to the grounds of refusal set out hereinafter:

CORPORATE SECRETARIAT AND GOVERNANCE
Applicable Statutory Documents (both EOH Holdings and Symplexity as appropriate)
Annual Reports
Board of Directors and Board Committee Terms of Reference
Codes of Conduct
Legal Compliance Records (both EOH Holdings and Symplexity as appropriate)
Memoranda of Incorporation
Group Policies and Procedures (both EOH Holdings and Symplexity as appropriate)
Statutory Returns to Relevant Authorities (both EOH Holdings and Symplexity as appropriate)

FINANCIAL DIVISION
Policies and Procedures (both EOH Holdings and SYMPLEXITY as appropriate)
Accounting Records (both EOH Holdings and SYMPLEXITY as appropriate)
Capital Expenditure Records (both EOH Holdings and Symplexity as appropriate)
Annual Financial Statements
Audit Reports (both EOH Holdings and Symplexity as appropriate)
Invoices and Statements (both EOH Holdings and Symplexity as appropriate)
Management Reports (both EOH Holdings and Symplexity as appropriate)
Purchasing Records (both EOH Holdings and Symplexity as appropriate)
Sale and Supply Records (both EOH Holdings and Symplexity as appropriate)
Tax Records and Returns (both EOH Holdings and Symplexity as appropriate)
Treasury Dealing (both EOH Holdings and Symplexity as appropriate)
Transactional Records (both EOH Holdings and Symplexity as appropriate)

HUMAN RESOURCES
Education and Training Records (both EOH Holdings and Symplexity as appropriate)
Employee Benefit Records
Employment Contracts (both EOH Holdings and Symplexity as appropriate)
Employment Equity Records
Employee Information (both EOH Holdings and Symplexity as appropriate)
Employee Share Option Scheme
Policies and Procedures (both EOH Holdings and Symplexity as appropriate)
Group Life
Leave Records
Medical Records

HUMAN RESOURCES
Pension and Retirement Funding Records
Study assistance scheme/s (both EOH Holdings and Symplexity as appropriate)
Tax Returns of employees
Statutory Returns to Relevant Authorities (both EOH Holdings and Symplexity as appropriate)

INFORMATION TECHNOLOGY
Hardware and Software Packages
Policies and Procedures
Internal Systems Support
Licenses
Operating Systems

LEGAL
Complaints, pleadings, briefs, and other documents pertaining to any actual or pending litigation, arbitration, or investigation (both EOH Holdings and Symplexity as appropriate)
Material licenses, permits and authorizations (both EOH Holdings and Symplexity as appropriate)

SALES, MARKETING AND COMMUNICATION
Brochures, Newsletters and Advertising Material (both EOH Holdings and Symplexity as appropriate)
Client Information (both EOH Holdings and Symplexity as appropriate)
Marketing Brochures (both EOH Holdings and Symplexity as appropriate)
Marketing Strategies (both EOH Holdings and Symplexity as appropriate)
Product Brochures (both EOH Holdings and Symplexity as appropriate)
Policies and Procedures (both EOH Holdings and Symplexity as appropriate)

3.4 Other Information

- 3.4.1. Symplexity may possess information and Records pertaining to other parties, including and without limitation: suppliers/ holding/ sister companies, joint ventures, and service providers.

If Symplexity searches for a Record and it is believed that the Record either does not exist or cannot be found, the Requester will be Notified by way of an affidavit or affirmation. This will include the steps that were taken to try to locate the Record.

3.5 Personal Information

- 3.5.1. Symplexity may hold Personal Information of the following types of Data Subjects: Employees, clients, suppliers, holding or sister companies, joint ventures and/ or service providers or other organisations and persons.

4. Access Procedure and Requests

The purpose of this section is to provide requesters with sufficient guidelines and procedures to facilitate a request for access to a record held by Symplexity.

It is important to note that an application for access to information can be refused in the event that the application does not comply with the procedural requirements of the Act. In addition, the successful completion and submission of an access request form does not automatically allow the requester access to the requested record. An application for access to a record is subject to certain limitations if the requested record falls within a certain category as specified within Part 3 Chapter 4 of the Act.

If it is reasonably suspected that the requester has obtained access to Symplexity records through the submission of materially false or misleading information, legal proceedings may be instituted against such requester.

4.1 Guidance on Completion of Prescribed Access Form: Sec 51 (1) (e)

4.1.1. In order for Symplexity to facilitate your access to a record you need to complete the attached prescribed access form attached as Annexure A. Please take note that the prescribed access form must be completed in full, failure to do so will result in the process being delayed until such additional information is provided. Symplexity will not be held liable for delays due to receipt of incomplete forms. Due cognisance should be taken of the following instructions when completing the Access Request Form because the Information Officer shall not process any request for access to a record until satisfied that all requirements have been met:

- The Access Request Form must be completed in the English language.
- Proof of identity is required to authenticate the requester's identity. If the requester acts as an agent requester, the requester shall provide proof of the identity of the person on whose behalf the request is made, the authority or mandate given to the requester by such person and proof of the identity of the requester as provided above.
- Type or print in BLOCK LETTERS an answer to every question.
- If a question does not apply, state "N/A" in response to that question.
- If there is nothing to disclose in reply to a particular question, state "nil" in response to that question.

4.2 Submission of Prescribed Access Form

4.2.1 The completed Access Request Form must be submitted either via conventional mail or e-mail and must be addressed to the Information Officer.

4.3 Payment of Prescribed Fees

4.3.1. Payment details can be obtained from the Information Officer and payment can be made either via a direct deposit, by bank guaranteed cheque or by postal order (no cash or credit card payments are accepted). Proof of payment must be supplied. Four types of fees are provided for in terms of the Act:

- **Request fee:** An initial, non-refundable R57.00 (incl. VAT) is payable on submission. This fee is not applicable to Personal Requesters, referring to any person seeking access to records that contain their personal information.
- **Reproduction fee:** This fee is payable with respect to all records that are automatically available.
- **Access fee:** If the request for access is successful an access fee may be required to re-imburse Symplexity for the costs involved in the search, reproduction and/or preparation of the record and will be calculated based on the Prescribed Fees.
- **Deposit:** A deposit of one third (1/3) of the amount of the applicable access fee, is payable if Symplexity receives a request for access to information held on a person other than the requester himself/herself and the preparation for the record will take more than six (6) hours. In the event that access is refused to the requested record, the full deposit will be refunded to the requester.

Refer to section 6 "Prescribed Fees" for a detailed breakdown of fees.

4.4 Notification

- 4.4.1. Symplexity will within thirty (30) days of receipt of the request decide whether to grant or decline the request and give notice with reasons (if required) to that effect.
- 4.4.2. The thirty (30) day period within which Symplexity has to decide whether to grant or refuse the request, may be extended for a further period of not more than thirty (30) days, if the request is for a large volume of information, or the request requires a search for information held at another office of Symplexity and the information cannot be reasonably be obtained within the original thirty (30) day period. Symplexity will notify the requester in writer should an extension be sought.
- 4.4.3. If the request for access to a record is successful, the requester will be notified of the following:
 - The amount of the access fee payable upon gaining access to the record;
 - An indication of the form in which the access will be granted; and
 - Notice that the requester may lodge an application with a court against the payment of the access fee and the procedure, including the period, for lodging the application.
 - If the request for access to a record is not successful, the requester will be notified of the following:
 - Adequate reasons for the refusal (refer to Third Party Information and Grounds for Refusal); and

- That the requester may lodge an application with a court against the refusal of the request and the procedure, including the period, for lodging the application.

4.5 Records that cannot be found or do not exist

If Symplexity has searched for a record and it is believed that the record either does not exist or cannot be found, the requester will be notified by way of an affidavit or affirmation. This will include the steps that were taken to try to locate the record.

5. Grounds for refusal of access to records and appeal

5.1 Grounds for Refusal: Chapter 4

5.1.1 Request may be refused on the following grounds, as set out in the Act:

- Requests may be refused on the following grounds, as set out in the Act:
- Mandatory protection of privacy of a third party who is a natural person, including a deceased person, which would involve the unreasonable disclosure of personal information of that natural person;
- Mandatory protection of commercial information of a third party or Symplexity, if the record contains:
- Trade secrets of the third party or Symplexity;
- Financial, commercial, scientific, or technical information which disclosure could likely cause harm to the financial or commercial interests of the third party or Symplexity; and
- Information disclosed in confidence by a third party to Symplexity if the disclosure could put that third party to a disadvantage or commercial competition.
- Mandatory protection of certain confidential information of a third party if disclosure of the record would result in a breach of a duty of confidence owed to that party in terms of an agreement.
- Mandatory protection of the safety of individuals, and the protection of property;
- Mandatory protection of records privileged from production in legal proceedings, unless the legal privilege has been waived; and
- Mandatory protection of research information of a third party and of Symplexity.

5.2 Appeal

- 5.2.1. If a requester is aggrieved by the refusal of the Information Officer to grant a request for a record, the requester may, within thirty (30) days of notification of the Information Officer's decision, apply to court for appropriate relief.

6. Prescribed Fees

Fees in Respect of Public Bodies (excluding VAT)

Item	Description	Amount
1.	The request fee payable by every requester	R100.00
2.	Photocopy of A4-size page	R1.50 per page or part thereof
3.	Printed copy of A4-size page	R1.50 per page or part thereof
4.	For a copy in a computer-readable form on:	
	(i) Flash drive (to be provided by requester)	R40.00
	(ii) Compact disc	
	• If provided by requester	R40.00
	• If provided to the requester	R60.00
5.	For a transcription of visual images per A4-size page	Service to be outsourced.
6.	Copy of visual images	Will depend on quotation from Service Provider
7.	Transcription of an audio record, per A4-size page	R24.00
8.	Copy of an audio record on:	
	(i) Flash drive (to be provided by requester)	R40.00
	(ii) Compact disc	
	• If provided by requester	R40.00
	• If provided to the requester	R60.00
9.	To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation	R100.00
	To not exceed a total cost of	R300.00

10.	Deposit: If search exceeds 6 hours	One third of amount per request calculated in terms of items 2 to 8.
11.	Postage, email, or any other electronic transfer	Actual expense if any.

Fees in Respect of Private Bodies (excluding VAT)

Item	Description	Amount
1.	The request fee payable by every requester	R140.00
2.	Photocopy/printed black & white copy of A4-size page	R2.00 per page or part thereof
3.	Printed copy of A4-size page	R2.00 per page or part thereof
4.	For a copy in a computer-readable form on:	
	(iii) Flash drive (to be provided by requester)	R40.00
	(iv) Compact disc	
	• If provided by requester	R40.00
	• If provided to the requester	R60.00
Item	Description	Amount
	• If provided by requester	R40.00
	• If provided to the requester	R60.00
5.	For a transcription of visual images per A4-size page	Service to be outsourced.
6.	Copy of visual images	Will depend on quotation from Service Provider
7.	Transcription of an audio record, per A4-size page	R24.00
8.	Copy of an audio record on:	
	(iii) Flash drive (to be provided by requester)	R40.00
	(iv) Compact disc	
	• If provided by requester	R40.00
	• If provided to the requester	R60.00
9.	To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation	R145.00
	To not exceed a total cost of	R435.00

10.	Deposit: If search exceeds 6 hours	One third of amount per request calculated in terms of items 2 to 8.
11.	Postage, email, or any other electronic transfer	Actual expense if any.

A request fee of R50.00 (excluding VAT) is payable upfront where a requester submits a request for access to information on anybody else other than a requestor.

7. Sharing of Personal Information

7.1 Symplexity may share personal information with:

- Other companies located outside of South Africa that provide services or goods to Symplexity, its customers or affiliates;
- Services providers who perform services on behalf of Symplexity; and
- Third party suppliers

7.2 Symplexity Security measures to protect personal information with:

- 7.2.1. Symplexity takes the security of your data seriously and therefore reasonable technical and organisational measures have been implemented to protect personal information. Together with the EOH Group, Symplexity has internal policies and controls in place to ensure that you data is not lost, accidentally destroyed, misused, or disclosed, and is not accessed except by our employees in the proper performance of their duties.
- 7.2.2. Symplexity will take steps to ensure that third party providers who process personal information on behalf of Symplexity apply adequate safeguards as required in terms POPIA.

7.3 Transborder Flows of Personal Information: PAIA Sec 51 (1)(c)(iv)

- 7.3.1. Symplexity may from time to time transfer personal information to another country for the purposes of rendering services to employees and customers. Symplexity will take the necessary steps to ensure that services providers and third-party operators are bound by laws, binding corporate rules or binding agreements that provide an adequate level of protection and uphold principles for reasonable and lawful processing of personal information in terms of POPIA.
- 7.3.2. The table below shows what Personal is processed for customers, partners, and resellers and that may also be transferred outside the Republic of South Africa, to which entity and potentially which countries.

PERSONAL INFORMATION CATEGORY	OEM/SUPPLIER	COUNTRY	APPLICABLE PRIVACY POLICY
Name Title/role Email address Phone number Company name Company Number Business address	!Kharos Benefits Solutions (Pty) Ltd	Namibia	<p>As per the End User License Agreement signed by !Kharos Benefits Solutions (Pty) Ltd: (See paragraph 13 Data Protection)</p> <p>The Service Provider shall comply with any Data Protection Laws applicable to it in its Processing of Customer Personal Data under or by virtue of this Agreement.</p> <p>1.1 The Service Provider will only Process Customer Personal Data to the extent</p>

PERSONAL INFORMATION CATEGORY	OEM/SUPPLIER	COUNTRY	APPLICABLE PRIVACY POLICY
Invoices with all company information			<p>necessary to provide the Services in accordance with this Agreement and will implement and take appropriate and reasonable technical and organisational measures, in accordance with its security policies as amended from time to time, to protect Customer Personal Data against accidental or unlawful destruction or accidental loss, alteration, unauthorised disclosure or access of Customer Personal Data transferred outside of South Africa or the Republic of Namibia, including to subcontractors or suppliers where required to provide the Services.</p> <p>1.2 The Customer shall provide sufficient notice and obtain sufficient consent and authorisation, under any applicable laws, from any relevant data subject (as defined in terms of Data Protection Laws) to permit the Processing of any Customer Personal Data by the Service Provider, its subcontractors or suppliers as provided for in this Agreement.</p>
Custodian of information of the hosted SAAS platform that includes all data subject's information (See 7.4)	PRIT	Namibia	https://www.prit.co.za/disclaimer

Kindly contact the Information Officer if more information in this regard is required

7.4 Purpose of Processing of Personal Information

7.4.1. Symplexity processes Personal Employee Information (and potential employees) which may include but it is not limited to the following data / reasons / purposes:

- Rendering of services to our customers
 - Employee administration
 - Providing or managing any information on products
 - Transacting with our suppliers
 - Maintaining customer records
 - Recruitment purposes
 - Apprenticeship and bursary purposes
 - Travel purposes
 - General administration
 - Financial and tax purposes
 - Legal purposes
 - Health and safety purposes
 - Visitor access monitoring purposes
 - Managing the premises and facilities
 - Investigating of and preventing fraud
- Debt recovery and responding to website enquires

7.5 Types of Personal Information

CATEGORIES INDIVIDUALS AND JURISTIC ENTITIES	CATEGORIES OF PERSONAL INFORMATION HELD	AVAILABILITY
Symplexity Employees & Clients' Employees	ID number Contact details Physical and postal address Date of birth Age Disability Information Employment history Criminal/background checks Fingerprints	Not automatically available

CATEGORIES INDIVIDUALS AND JURISTIC ENTITIES	CATEGORIES OF PERSONAL INFORMATION HELD	AVAILABILITY
	CVs Education history Banking details Income tax reference number Remuneration and benefit information (including medical aid, pension/provident fund information) Details related to employee performance Disciplinary procedures Employee disability information Employee pension and provident fund information Employee contracts Employee performance records Physical access records CCTV records Health and safety records Time and attendance records	
Suppliers/Service Providers	Entity name registration number income tax number contact details for representative persons FICA documentation BBB-EE certificates Invoices Contractual documentation	Not automatically available
Directors and Shareholders	Name, Surname, ID numbers, financial information as required for statutory reporting	Not automatically available
New Job Applicants	Name	

CATEGORIES INDIVIDUALS AND JURISTIC ENTITIES	CATEGORIES OF PERSONAL INFORMATION HELD	AVAILABILITY
	<p>Surname Address Contact details Email address Telephone number Details of qualifications Skills Experiences and employment history</p> <p>Information about your current level of remuneration, including benefit entitlements, whether or not you have a disability for which Symplexity needs to make reasonable adjustments during the recruitment process, and information about your entitlement to work in South Africa</p>	
Website Visitors	<p>Name Email address Company name Job title and telephone number</p>	Not automatically available
Visitors	<p>Name Email address Company name Contact Details Physical access records Electronic access records scans and CCTV records</p>	Not automatically available
Employees Children	<p>Name Address and contact details</p>	Not automatically available

CATEGORIES INDIVIDUALS AND JURISTIC ENTITIES	CATEGORIES OF PERSONAL INFORMATION HELD	AVAILABILITY
	Birth certificates Age Child medical information	
Employees Emergency Contact Details	Name Address and contact details	Not automatically available

7.6 Recipients of categories of recipients to whom the personal information may be supplied

This table refers to data for employees, or prospective employees. There may be additional recipients not recorded in the table below.

CATEGORY OF PERSONAL INFORMATION	RECIPIENTS OR CATEGORIES OF RECIPIENTS TO WHOM THE PERSONAL INFORMATION MAY BE SUPPLIED
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus

8. Security measures to protect Personal Information- PAIA Sec 51 (1)(c)(v)

It should be noted that Symplexity makes use of EOH Group systems as well as bespoke Symplexity only systems and security and as such the following applies (where these are not yet implemented, they are under investigation and evaluation or planned):

- Physical security measures
 - Access control to offices
 - Additional access control to areas where hard copies are stored
- Cyber Security measures
 - Perimeter security (Controlled access per application and port)
 - Controlled network segregation.
 - Endpoint encryption
 - Server encryption
 - Anti-virus for endpoints and servers includes Host Intrusion Prevention System (HIPS) and Endpoint detection and response (EDR)
 - Data classification (underway)
 - Data Loss Prevention (DLP) and Zero-Trust solution (underway)
 - Password control to devices where electronic information is stored

- Mobile Device Management for accessing corporate data via mobile devices.
- Training information security
All Employees of Symplexity have received training on
 - The protection of Personal Information; and
 - Cyber Security

9. Availability of Symplexity PAIA Manual

A Public Copy is available for inspection:

- On the Company's website at <https://www.symplexity.co.za>
Symplexity offices (24 Victoria Link, Route 21 Corporate Park, Irene ,0157) for public inspection during normal business hours;
- To any person upon request and upon the payment of a reasonable prescribed fee; and
- To the Information Regulator upon request.



A fee for a copy of the Manual, as contemplated in annexure B (see section 6 of this manual) of the Regulations, shall be payable per each A4-size photocopy made.

10. Updating of this PAIA Manual

The Symplexity Information Officer will on a regular basis update this manual.

11. Issued and authorised by

This PAIA manual is issued and authorised by the following:

Name: Louis Nortje	Name: Cecile Van Niekerk
Role: Managing Director, Symplexity	Role: Information Officer, Symplexity
Signature: 	Signature: 
Date: 19-Jan-2022	Date: 18-Jan-2022

12. Annexure A

12.1 Request for Access to Record Form

NOTE:

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

TO: The Information Officer
PO BOX 1632
Wingate Park
0153
(Address)

E-Mail Address: cecilen@symplexity.co.za

Mark with an "X"

Request is made in my own name Request is made on behalf of another person.

PERSONAL INFORMATION			
Full Names			
Identity Number			
Capacity in which request is made (<i>when made on behalf of another person</i>)			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile: Not Available
	Cellular:		
Full names of person on whose behalf request is made (<i>if applicable</i>):			

Identity Number	
-----------------	--

Postal Address	
----------------	--

Street Address	
----------------	--

E-mail Address	
----------------	--

Contact Numbers	Tel. (B)		Facsimile	Not Available
-----------------	----------	--	-----------	---------------

	Cellular	
--	----------	--

PARTICULARS OF RECORD REQUESTED
<i>Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</i>

Description of record or relevant part of the record:	

Reference number, if available	
--------------------------------	--

Any further particulars of record	

TYPE OF RECORD <i>(Mark the applicable box with an "X")</i>

Record is in written or printed form	
--------------------------------------	--

Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer generated images, sketches, etc)</i>	
--	--

Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	
FORM OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

MANNER OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.

Indicate which right is to be exercised or protected	
Explain why the record	
requested is required for the exercise or protection of the aforementioned right:	

FEEs	
a)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication <i>(Please specify)</i>
	Not Available	

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

Reference number:	
-------------------	--

<i>Request received by:</i> <i>(State Rank, Name And Surname of Information Officer)</i>	
<i>Date received:</i>	
<i>Access fees:</i>	
<i>Deposit (if any):</i>	

Signature of Information Officer

12.2 Request for a copy of the guide

TO: The Information Officer
 PO BOX 1632
 Wingate Park
 0153
(Address)

E-Mail Address: cecilen@symplexity.co.za

I,

Full names:				
In my capacity as (mark with "x"):	Information officer		Other	
Name of *public/private body <i>(if applicable)</i>				
Postal Address:				
Street Address:				
E-mail Address:				
Facsimile:				
Contact numbers:	Tel.(B):		Cellular:	

Hereby request the following copy (ies) of the Guide:

Language (mark with "X")		No of copies	Language (mark with "X")		No of copies
	Sepedi			Sesotho	
	Setswana			siSwati	
	Tshivenda			Xitsonga	
	Afrikaans			English	
	isiNdebele			isiXhosa	
	isiZulu				

Manner of collection (mark with "x"):

Personal collection	Postal address	Facsimile	Electronic communication (Please specify)

Signed at _____ this _____ day of _____ 20 _____

Signature of requester

12.3 Internal appeal form

Internal Remedies:

Requestors may appeal the ruling if the request for information is refused, and/or the requester is not satisfied with the answer supplied. An appeal form, attached below, must be completed with adequate reasons for the appeal and submitted to the Information Officer within 30 (thirty) days of the notification of the decision. The Information Officer, or Group Information Officer of the Holding Company will review the appeal collectively and decide on the validity thereof. The matter may be escalated to Legal if deemed necessary. The result will be communicated back to the data subject within a reasonable timeframe, which will be noted upon receipt of the appeal.

Reference Number (of request if known):

PARTICULARS OF PUBLIC BODY				
Name of Public Body				
Name and Surname of Information Officer:				
PARTICULARS OF COMPLAINANT WHO LODGES THE INTERNAL APPEAL				
Full Names				
Identity Number				
Postal Address				
Contact Numbers	Tel. (B)		Facsimile	
	Cellular			
E-Mail Address				
Is the internal appeal lodged on behalf of another person?		Yes	<input type="checkbox"/>	No
			<input type="checkbox"/>	<input type="checkbox"/>
If answer is "yes", capacity in which an internal appeal on behalf of another person is lodged: <i>(Proof of the capacity in which appeal is lodged, if applicable, must be attached.)</i>				
PARTICULARS OF PERSON ON WHOSE BEHALF THE INTERNAL APPEAL IS LODGED <i>(If lodged by a third party)</i>				
Full Names				
Identity Number				
Postal Address				
Contact Numbers	Tel. (B)		Facsimile	
	Cellular			
E-Mail Address				
DECISION AGAINST WHICH THE INTERNAL APPEAL IS LODGED <i>(mark the appropriate box with an "X")</i>				
Refusal of request for access				<input type="checkbox"/>

Decision regarding fees prescribed in terms of section 22 of the Act	
Decision regarding the extension of the period within which the request must be dealt with in terms of section 26(1) of the Act	
Decision in terms of section 29(3) of the Act to refuse access in the form requested by the requester	
Decision to grant request for access	
 GROUNDS FOR APPEAL <i>(If the provided space is inadequate, please continue on a separate page and attach it to this form. all the additional pages must be signed)</i>	
State the grounds on which the internal appeal is based:	
State any other information that may be relevant in considering the appeal:	

You will be notified in writing of the decision on your internal appeal. Please indicate your preferred manner of notification:

Postal address	Facsimile	Electronic communication <i>(Please specify)</i>

Signed at _____ this _____ day of _____ 20 _____

Signature of Appellant/Third party

FOR OFFICIAL USE
OFFICIAL RECORD OF INTERNAL APPEAL

Appeal received by: <i>(State rank, name and surname of Information Officer)</i>			
Date received:			
Appeal accompanied by the reasons for the information officer's decision and, where applicable, the particulars of any third party to whom or which the record relates, submitted by the information officer:	Yes	<input type="checkbox"/>	
	No	<input type="checkbox"/>	
OUTCOME OF APPEAL			
Refusal of request for access. Confirmed?	Yes	<input type="checkbox"/>	New decision <i>(if not confirmed)</i>
	No	<input type="checkbox"/>	
Fees (Sec 22). Confirmed?	Yes	<input type="checkbox"/>	New decision <i>(if not confirmed)</i>
	No	<input type="checkbox"/>	
Extension (Sec 26(1)). Confirmed?	Yes	<input type="checkbox"/>	New decision <i>(if not confirmed)</i>
	No	<input type="checkbox"/>	
Access (Sec 29(3)). Confirmed?	Yes	<input type="checkbox"/>	New decision <i>(if not confirmed)</i>
	No	<input type="checkbox"/>	
	Yes	<input type="checkbox"/>	New decision



Request for access granted. Confirmed?	No	<input type="checkbox"/>	(if not confirmed)
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Signed at _____ this _____ day of _____ 20 _____

Relevant Authority

12.4 Complaint form

NOTE:

1. This form is designed to assist the Requester or Third Party (hereinafter referred to as “the Complainant”) in requesting a review of a Public or Private Body’s response or non-response to a request for access to records under the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000) (“PAIA”). Please fill out this form and send it to the following email address: PAIAComplaints@infoRegulator.org.za or complete online complaint form available at <https://www.justice.gov.za/infoREG/>.
2. PAIA gives a member of the public a right to file a complaint with the Information Regulator about any of the nature of complaints detailed in part F of this complaint form.
3. It is the policy of the Information Regulator to defer investigating or to reject a complaint if the Complainant has not first given the public or private body (herein after referred to as “the Body”) an opportunity to respond to and attempt to resolve the issue. To help the Body address your concerns prior to approaching the Information Regulator, you are required to complete the prescribed **PAIA Form 2** and submit it to the Body.
4. A copy of this Form will be provided to the Body that is the subject of your complaint. The information you provide on this form, attached to this form or that you supply later, will only be used to attempt to resolve your dispute, unless otherwise stated herein.
5. The Information Regulator will only accept your complaint once you confirm having complied with the prerequisites below.
6. **Please attach copies of the following documents if you have them:**
 - a. Copy of the form to the Body requesting access to records;
 - b. The Body’s response to your complaint or access request;
 - c. Any other correspondence between you and the Body regarding your request;
 - d. Copy of the appeal form, if your complaint relate to a public body;
 - e. The Body’s response to your appeal;
 - f. Any other correspondence between you and the Body regarding your appeal;
 - g. Documentation authorizing you to act on behalf of another person (if applicable);
 - h. Court Order or Court documents relevant to your complaint, if any.
7. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.

12.5 CAPACITY OF PERSON/PARTY LODGING A COMPLAINT

Complainant Personally

Representative of Complainant

Third Party

PREREQUISITES				
Did you submit request (PAIA form) for access to record of a public/private body?	Yes		No	
Have 30 days lapsed from the date on which you submitted your PAIA form?	Yes		No	
Did you exhaust all the internal appeal procedure against a decision of the Information officer of a public body?	Yes		No	
Have you applied to Court for appropriate relief regarding this matter?	Yes		No	