



LFP GROUP HOLDINGS (PTY) LTD
REGISTRATION NUMBER: 2014/198623/07

MANUAL PUBLISHED IN TERMS OF SECTION 51
OF THE PROMOTION OF ACCESS
TO INFORMATION ACT, ACT NO. 2 OF 2000, AS AMENDED
(hereinafter referred to as the "PAIA" Act)

1. INTRODUCTION

- 1.1. LFP Group Holdings (Pty) Limited (the "Company") conducts business as a leader in providing skills development to its clients with specific emphasis in assisting clients procure sustainable scores on their respective B-BBEE Scorecards. The Company is registered with Sector Education and Training Authority (SETA) to ensure that all its skills development programs to its clients are accredited.
- 1.2. This Promotion of Access to Information Manual ("Manual") provides an outline of the type of records and the personal information it holds, and explains how to submit requests for access to these records in terms of the Promotion of Access to Information Act, Act No. 2 of 2000, as amended, ("PAIA Act"). In addition, it explains how to **access**, or **object to**, personal information held by the Company, or **request correction** of the personal information, in terms of Sections 23 and 24 of the Protection of Personal Information Act, Act No. 4 of 2013, as amended ("POPI Act").
- 1.3. The PAIA and POPI Acts give effect to everyone's constitutional right of access to information held by parties in the private sector or by public bodies, if the record or personal information is required for the exercise or protection of any rights. If a public body lodges a request for such information, the public body must be acting in the public interest.



- 1.4. Requests shall be made in accordance with the prescribed procedures, at the rates provided. The forms and tariffs are dealt with in paragraph 15 hereto.

2. AVAILABILITY OF THIS PAIA MANUAL

This manual is published on the Company website at www.lfpgroup.co.za or alternatively, a copy can be requested from the Financial Department of the Company (see contact details in Section 4).

3. AVAILABILITY OF GUIDES TO THE PAIA AND POPI ACTS

Guides to the PAIA and POPI Acts can be obtained and queries directed to:

<u>PAIA ACT</u>	<u>POPI ACT</u>
South African Human Rights Commission Promotion of Access to Information Act Unit Research and Documentation Department Private Bag 2700 Houghton Johannesburg 2041 29 Princess of Wale Terrace Corner York and St Andrews Streets Parktown Johannesburg 2193 Telephone number: (011) 484 8300 Fax Number: (011) 484-7146/7 Website: www.sahrc.org.za E-mail: PAIA@sahrc.org.za	Information Regulator (Details still to be published).



4. **COMPANY CONTACT DETAILS**

4.1. Company contact details in terms of PAIA, Section 51:

4.1.1. **LFP GROUP HOLDINGS (PTY) LTD**
OMSA HOUSE
CORNER RABIE AND AIMEE STREETS
FOUNTAINBLEAU
RANDBURG
2194

4.1.2. Telephone number: (011) 791-1602;

4.1.3. Website: www.lfpgroup.co.za;

4.1.4. Duly authorised persons:

<u>FINANCE MANAGER</u>	<u>DATA PRIVACY PROTECTION RESPONSIBLE (DPPR)</u>
George george@lfpgroup.co.za	IT Manager – Marcel marceln@lfpgroup.co.za



5. COMPANY RECORDS

5.1. Company records availability.

<u>DEPARTMENTAL RECORDS</u>	<u>SUBJECT</u>	<u>CLASSIFICATION NO.</u>
Human Resources Division	Employee records	4, 5, 9
	Employment Contracts	4, 5
	Personnel Guidelines, Policies and Procedures	12
	Payroll records	4, 5
	Recruitment Records	4, 5
	In-and-Ex-patriates' Records	4, 5
Financial Division	Audited Financial Statements	12
	Tax Records (Company and Employees)	4, 12
	Asset Register	12
	Supplier Records	4, 5
	Management Accounts	12
Legal Services and Compliance Division	General Contract Documentation	6, 12
	Company Guidelines, Policies and Procedures	12
	Intellectual Property Records	3
	Employee, customer and supplier information	10
	Immovable Property Records	12
	Statutory Records	12
	Market Information	12, 13
Sales and Marketing Division	Product Brochures	1
	Owner Manuals	4, 5
	Product Sales Records	1
	Marketing and Future Product Strategies	12
	Customer Information and Database	4, 5, 12
Customer Interaction Centre	Customer records	4, 5
IT Department	Processing, Testing and Development Records	4, 5
Facilities Management Department	Physical, Security Records (Visitors, Suppliers, Contractors, Employees)	4, 5



	Time and Attendance Records	4,5
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<u>CLASSIFICATION CODE</u>	<u>ACCESS</u>	<u>CLASSIFICATION (PAIA SECTION)</u>
1.	May be Disclosed	Public Access Document
2.	May not be Disclosed	Request after commencement of criminal or civil proceedings (S7)
3.	May be Disclosed	Subject to copyright
4.	Limited Disclosure	Personal information of natural persons that belongs to the requester of that information, or personal information of juristic persons represented by the requestor of that information (S61)
5.	May not be Disclosed	Unreasonable disclosure of personal information or of Natural person (S63(1)) or Juristic Person (POPI)
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 the Company or 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)
10.	May not be Disclosed	Legally privileged document (S67)
11.	May not be Refused	Environmental testing / investigation which reveals public safety / environmental risks (S64(2), S68(2))
12.	May not be Disclosed	Commercial information of Private Body (S680)
13.	May not be Disclosed	Likely to prejudice research and development information of the Company or a third party (S69)
14.	May not be refused	Disclosure in public interest (S70).



6. **PROCESSING OF PERSONAL INFORMATION**

The Company takes the privacy and protection of personal information very seriously and will only process personal information in accordance with the current South African privacy legislation. The relevant personal information privacy principles relating to the processing thereof (including, but not limited to, the collection, handling, transfer, sharing, correction, storage, archiving and deletion) will be applied to any personal information processed by the Company.

7. **THE PURPOSE OF PROCESSING OF PERSONAL INFORMATION BY THE COMPANY**

7.1. We process personal information for a variety of purposes, including but not limited to the following:

7.1.1. To provide or manage any information, products and/or services requested by data subjects;

7.1.2. To help us identify data subjects when they contact the Company;

7.1.3. To maintain customer records;

7.1.4. To maintain employee records.



8. CATEGORIES OF DATA SUBJECTS AND PERSONAL INFORMATION PROCESSED BY THE COMPANY

8.1. Categories of data subjects and personal information processed by the Company include the following:

<u>CATEGORIES OF DATA SUBJECTS</u>	<u>PERSONAL INFORMATION PROCESSED</u>
Learners Information	Learner personal information Learner location information
Company business partners	Partner personal information Personal information of partner employees
Suppliers	Supplier personal information Personal information of supplier representatives
Employees	Employee personal information Employee medical information Employee disability information Employee contracts Employee performance records Payroll records Electronic access records Physical address records Surveillance records Health and safety records Training records Employment history Time and attendance records
Job Applicants	Curriculum Vitae and application forms Criminal checks Background checks
Visitors	Physical access records Electronic access records and scans Surveillance records



9. **RECIPIENTS OR CATEGORIES OF RECIPIENTS WITH WHOM PERSONAL INFORMATION IS SHARED**

9.1. The Company may share the personal information of its data subjects for any of the purposes outlined in Section 4.1, with the following:

9.1.1. Any other LFP related group company in South Africa and its authorised partners and service providers;

9.1.2. The Company's service providers and agents who perform services on our behalf.

9.2. The Company will not share the personal information of our data subjects with any third parties, except when:

9.2.1. The Company is obliged to provide such information for legal or regulatory purposes as the Company is required to do so for purposes of existing or future legal proceedings,

9.2.2. The Company is selling one or more of its businesses to a third party to whom it may transfer its rights under any client agreement it has with a client;



9.2.3. The Company is involved in the prevention of fraud, loss, bribery or corruption.

9.3. Where the third party perform services and process personal information on the Company's behalf as this is required to provide or manage any information, products and/or services to data subjects; or needed to help the Company improve the quality of its products and services.

9.4. The Company will send its data subjects notifications or communications if we are obliged by law, or in terms of its contractual relationship with the said data subjects.

9.5. The Company will only disclose personal information to government authorities if it is required to do so by law.

9.6. The Company's employees, members of the LFP Group, our agencies and our suppliers, are required to adhere to data privacy and confidentiality principles and to attend data privacy training.

10. **INFORMATION SECURITY MEASURES TO PROTECT PERSONAL INFORMATION**

10.1. Reasonable technical and organisational measures have been implemented for the protection of personal information processed by the



Company and its operators. In terms of the POPI Act, operators are third parties that process personal information on behalf of the Company.

10.2. The Company continuously implements and monitors technical and organisational security measures to protect the personal information that it holds, against unauthorised access, as well as accidental or wilful manipulation, loss or destruction.

10.3. The Company will at all times take reasonable steps to ensure that operators that process personal information on behalf of the Company apply adequate safeguards as outlined above.

11. **TRANS-BORDER FLOWS OF PERSONAL INFORMATION**

11.1. The Company will only transfer personal information across South African borders if the relevant business transactions or situation requires trans-border processing and will do so only in accordance with South African legislative requirements; or if the data subject consents to transfer of their personal information to third parties in foreign countries.

11.2. The Company will take steps to ensure that 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 the POPI Act.



- 11.3. The Company will take steps to ensure that operators that process personal information in jurisdictions outside of South Africa, apply adequate safeguards as outlined in Section 4.12.

12. **PERSONAL INFORMATION RECEIVED FROM THIRD PARTIES**

Should the Company receive personal information from a third party on behalf of a data subject, the Company requires confirmation that they have written consent from the data subject that they are aware of the contents of this PAIA manual and the Company Privacy Policy, and do not have any objection to the Company processing their information in accordance with this policy.

13. **PRESCRIBED REQUEST FORMS AND FEES**

13.1. **FORM OF REQUEST**

- 13.1.1. To facilitate the processing of your request, kindly:

13.1.1.1. Use the prescribed form on the Company website;

13.1.1.2. Address your request to the Human Resources Department.

13.1.1.3. Provide sufficient detail to enable the Company to identify:



- 13.1.1.3.1. The record(s) requested.
- 13.1.1.3.2. The requestor (and, if an agent is lodging the request, proof of capacity).
- 13.1.1.3.3. The South African postal address, email address or fax number of the requestor.
- 13.1.1.3.4. The form of access required.
- 13.1.1.3.5. The South African postal address, email address or fax number of the requestor.
- 13.1.1.3.6. If the requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof.
- 13.1.1.3.7. The right which the requestor is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right.



14. **PRESCRIBED FEES**

14.1. The following applies to requests (other than personal requests):

14.1.1. A requestor is required to pay the prescribed fees (R50.00) before a request will be processed.

14.1.2. If the preparation of the record requested requires more than the prescribed 6 (six) hours, a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted).

14.1.3. A requestor may lodge an application with a court against the tender/payment of the request fee and/or deposit.

14.1.4. Records may be withheld until the fees have been paid.

14.1.5. The detailed Fee Structure is available on the website of the Company, at the following address:

LFP GROUP HOLDINGS (PTY) LTD
OMSA HOUSE
CORNER RABIE AND AIMEE STREETS
FOUNTAINBLEAU



RANDBURG

2194

15. ACCESS TO PRESCRIBED FORMS AND FEES

15.1. Prescribed forms and fees are published on the Company website or, alternatively, copies can be requested from the Legal Services and Compliance Director (see contact details in Section 2). Prescribed forms and fees can be found on the Company website as follows:

15.1.1. Forms: Form C – Request for Access to Record of Private Body,

15.1.2. Fees: Schedule of Prescribed Fees.

16. REMEDIES

The Company does not have internal appeal procedures regarding PAIA and POPI Act requests. As such, the decision made by the duly authorised persons in Section 2, is final. If a request is denied, the requestor is entitled to apply to a court with appropriate jurisdiction, or the Information Regulator (once established), for relief.

