

**VERMILLION (PTY)LTD**

Registration number 2017/029822/07  
FSP 50486

# **PAIA MANUAL**

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

## TABLE OF CONTENTS

### 1. LIST OF ACRONYMS AND ABBREVIATIONS

**NB: please insert relevant applicable acronyms and abbreviations**

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

#### **3.1. Chief Information Officer**

Name: Grant Smee

Tel: (+27) 021 300-1143  
Address: Time Business Park Ground Floor  
39 Blaauwberg Road Tableview 7441  
Email : [info@vsure.co.za](mailto:info@vsure.co.za)

- 3.2. Deputy Information Officer *(NB: if more than one Deputy Information Officer is designated, please provide the details of every Deputy Information Officer of the body designated in terms of section 17 (1) of PAIA.*

Name: Jared Bartholomew - Deputy Information Officer  
Tel: (+27) 021 300-1143  
Email: [jared@vsure.co.za](mailto:jared@vsure.co.za)

- 3.3 Access to information general contacts

Email: [info@vsure.co.za](mailto:info@vsure.co.za)

**3.4 National or Head Office**

Postal Address:  
Time Business Park Ground Floor  
39 Blaauwberg Road Tableview 7441

Physical Address: Same as above

Telephone: (+27) 021 300-1143

Email: [info@vsure.co.za](mailto:info@vsure.co.za)

Website: [www.vermillion.co.za](http://www.vermillion.co.za)

**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 ENGLISH and can be obtained in another 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 PAIA<sup>1</sup> and section 56 of POPIA<sup>2</sup>;

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 11<sup>3</sup>; and

4.3.3.2. access to a record of a private body contemplated in section 50<sup>4</sup>;

4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;

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<sup>1</sup> 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.*

<sup>2</sup> 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.*

<sup>3</sup> 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.*

<sup>4</sup> 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.*

- 4.3.5. 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-
  - 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 14<sup>5</sup> and 51<sup>6</sup> 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 15<sup>7</sup> and 52<sup>8</sup> 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 22<sup>9</sup> and 54<sup>10</sup> regarding fees to be paid in relation to requests for access; and

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<sup>5</sup> 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.

<sup>6</sup> 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.

<sup>7</sup> 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

<sup>8</sup> 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

<sup>9</sup> 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.

<sup>10</sup> 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.

4.3.10. the regulations made in terms of section 92<sup>11</sup>.

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/infoereg/>).

4.6 A copy of the Guide is also available in the following official language, for public inspection during normal office hours-

4.6.1 ENGLISH

## 5. CATEGORIES OF RECORDS OF VERMILLION (PTY) LTD WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

*NB: Please specify the categories of records held by the body which are available without a person having to request access by completing Form C, types of the records and how the records can be accessed. These are mostly records that maybe available on the website and a person may download or request telephonically or by sending an email or a letter.*

*Below is an example of the table that can be used.*

| Category of records | Types of the Record | Available on Website | Available upon request |
|---------------------|---------------------|----------------------|------------------------|
|                     |                     | X                    | X                      |
|                     |                     |                      |                        |

<sup>11</sup> 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.”

**6. DESCRIPTION OF THE RECORDS OF VERMILLION (PTY) LTD WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION**

**NB:** Please specify all the records which are created and available in accordance with any of the South African legislation. Below is an example of the table that can be used in describing the records and applicable 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 VERMILLION (PTY) LTD)**

**NB:** Describe the subjects (i.e. Finance, SCM or HR), in respect of which the body holds records and the categories of records held on each subject. Below is an example of the table that can be used. .

| Subjects on which the body holds records | Categories of records                                                                                                                   |
|------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|
| Strategic Documents, Plans, Proposals    | Annual Reports, Strategic Plan, Annual Performance Plan.                                                                                |
| Human Resources                          | <ul style="list-style-type: none"> <li>- HR policies and procedures</li> <li>- Advertised posts</li> <li>- Employees records</li> </ul> |

## 8. PROCESSING OF PERSONAL INFORMATION

### 8.1 Purpose of Processing Personal Information

*Personal information will only ever be processed with a view to treating customers fairly and or for legislative and compliance requirements.*

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

**NB:** *Specify the categories of data subjects in respect of whom the body processes personal information and the nature or categories of the personal information being processed.*

*Below is the template that can be used to set out the categories of data subjects and the description of the nature or categories of the personal information to be processed. Note that the nature or categories of the personal information is dependent on the purpose of the body in performing its functions or services. .*

| Categories of Data Subjects | Personal Information that may be processed                                                                                                                                                                                                 |
|-----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Customers / Clients         | name, address, registration numbers or identity numbers, employment status and bank details ,next of kin, marital status , insurance and investment information and as otherwise authorised and provided in the client appointment mandate |
| Service Providers           | names, registration number, vat numbers, address, trade secrets and bank details and as otherwise authorised and provided in the client appointment mandate                                                                                |
| Employees                   | address, qualifications, date of birth , occupation gender ,race and as otherwise authorised and provided in the client appointment mandate                                                                                                |

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

***NB:** Specify the person or category of persons to whom the body may disseminate personal information. Below is an example of the category of personal information which may be disseminated and the recipient or category of recipients of the personal information.*

| 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                                                                          |

### 8.4 Planned transborder flows of personal information

#### Transborder Flows of Personal Information

In terms of section 72 of the Protection of Personal Information Act (POPIA), this body may, where necessary for operational or processing purposes, transmit certain categories of personal information across the borders of the Republic of South Africa.

Currently, the body **does make use of cloud-based service providers** located outside the Republic for the purposes of secure data storage, backup, and business continuity. The countries to which personal information may be transmitted include:

- **Ireland** (Microsoft Azure / Office365)
- **Germany** (AWS Europe Region)
- **United States of America** (Google Cloud / Salesforce CRM)

The categories of personal information that may be transferred include, but are not limited to:

- Client contact details (names, email addresses, phone numbers)
- Financial information (banking details, transaction records)
- Employment information (CVs, contracts, tax numbers)
- Communication records (email and messaging archives)
- Identity information (ID numbers, passport copies, company registration numbers)

All service providers handling personal information on behalf of the body are subject to contractual obligations that ensure compliance with the principles of lawful processing and adequate data protection, in line with POPIA.

## **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**

### **Information Security Measures**

The responsible party is committed to ensuring the confidentiality, integrity, and availability of personal information in its possession or under its control. In accordance with section 19 of the Protection of Personal Information Act (POPIA), appropriate, reasonable technical and organisational measures have been or are being implemented to prevent:

- Loss of, damage to or unauthorised destruction of personal information, and
- Unlawful access to or processing of personal information.

The following security safeguards are in place (or under implementation):

#### **Technical Safeguards:**

- **Data Encryption:** Personal information is encrypted both in transit (via SSL/TLS protocols) and at rest using industry-standard encryption methods.
- **Anti-virus and Anti-malware:** Enterprise-grade anti-virus and anti-malware solutions are deployed across all endpoints and servers.
- **Firewalls and Intrusion Detection:** Network firewalls, intrusion detection systems (IDS), and intrusion prevention systems (IPS) are used to detect and block unauthorised access.
- **Secure User Authentication:** Multi-factor authentication (MFA) is implemented for access to all critical systems and applications.

## **9. AVAILABILITY OF THE MANUAL**

9.1 A copy of the Manual is available-

9.1.1 on ( [www.vsure.co.za](http://www.vsure.co.za) ), if any;

9.1.2 head office of the VERMILLION (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 VERMILLION (PTY) LTD will on a regular basis update this manual.

***Issued by***

**GRANT SMEE**

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(Name of the information Officer)

**DIRECTOR**