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This manual was prepared in accordance with section 51 of the **Promotion of Access to Information Act, 2000** and to address requirements of the **Protection of Personal Information Act, 2013**.

This manual applies to

**International Frontier Technologies SOC Ltd**

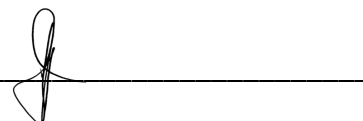
**Registration number: 2009/007987/30**

t/a

**Interfront**

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## **1. Introduction**

1.1 International Frontier Technologies SOC Ltd (“Interfront”) is a global technology solutions provider and focuses on the customs and border management business sphere.

1.2 The Promotion of Access to Information Act, 2 of 2000 (“PAIA”) seeks to advance the values of transparency and accountability. PAIA came into effect on 9 March 2001.

1.3 PAIA establishes the following statutory rights of requestors to any record held by Interfront:

1.3.1 that record is required for the exercise or protection of any of his or her legal rights;

1.3.2 that requestor complies with all the procedural requirements;

1.3.3 access is not refused in terms of any ground referred to in PAIA.


1.4 However, section 9 of PAIA recognises that the right to access information cannot be unlimited and should be subject to justifiable limitations, including, but not limited to:

1.4.1 limitations aimed at the reasonable protection of privacy;

1.4.2 commercial confidentiality;

1.4.3 effective, efficient and good governance; and

1.4.4 in a manner which balances that right with any other rights, including such rights contained in the Bill of Rights in the Constitution.



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## **2. Scope**

2.1 This Manual has been prepared and published in accordance with the requirements of section 10 of PAIA and recognises that upon commencement of the Protection of Personal Information, Act 4 of 2013 (POPIA), that the appointed Information Regulator will be responsible to regulate compliance with PAIA and its regulations by private and public bodies.

2.2 Specifically the manual provides information on:

2.2.1 the contact details of Interfront, for requests in terms of the PAIA and POPIA;

2.2.2 the subjects and categories of records that are held by Interfront;

2.2.3 records that are available in terms of any other legislation; and

2.2.4 the procedure that needs to followed to obtain access to a record.

## **3. Availability of the Manual**


This manual is available in both printed and a Portable Document Format (PDF) version.

## **4. Confidentiality and Access to Information**

Interfront will hold any information provided to it by individuals or others on a confidential basis, subject to Interfront's obligations under law, including PAIA and POPIA.

## **5. Entry Point for Request**

All request in terms of PAIA can be referred to:



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**The Company Secretary:** Mrs. Madelein Pepperell  
**Street Address:** Third Floor St Andrews Office Building  
Somerset Links Office Park  
De Beers Avenue  
Somerset West, 7130  
**Postal Address:** Postnet Suite 10, Private Bag X15, Somerset West, 7129  
**Telephone Number:** +27 21 840 3400  
**Fax Number:** +27 21 840 3401  
**Email Address:** secretary@interfront.co.za

## **6. Requesting Information**

6.1 PAIA provides that a person may only request information in terms of PAIA, if the information is required for the protection of a right. Only requests for access, where the requestor can furnish Interfront with sufficient particulars as to the right the requestor is seeking to protect, will be considered. A requestor can request access to information in different capacities; the category will influence the amount to be charged when a request has been lodged.

6.2 Requestors can be classified in different categories:

6.2.1 **Personal Requestor:** is a person who requests information about him / herself. Interfront will voluntarily provide the requested information, or give access to any record with regard to the requestor's personal information. The prescribed fee for reproduction of the information requested will be charged.

6.2.2 **A Requestor other than a Personal Requestor:** is a person requesting information on behalf of someone else; a public body, requests information in the public interest. This requestor is entitled to request access to information on third parties.



6.3 In considering such a request, Interfront will adhere to the provisions of PAIA. Section 71 requires that Interfront takes all reasonable steps to inform a third party to whom the requested record relates of the request, informing him/her that he/she may make a written or oral representation to Interfront why the request should be refused or, where required, give written consent for the disclosure of the information. Interfront is not obliged to voluntarily grant access to such records. The requestor must fulfil the prerequisite requirements, in accordance with the requirements of the PAIA and as stipulated in Chapter 5; Part 3, including the payment of a request and access fee.

## **7. Guidance to Requestors**

7.1 The Human Rights Commission is required by law to compile a guide that will include the following:

7.1.1 A description of the objects of PAIA.

7.1.2 The relevant information of every private body as applicable.


7.1.3 The manner and form in which requests must be lodged.

7.1.4 The remedies available to requestors should a body not comply with PAIA.

7.1.5 The manner in which an appeal can be lodged.

7.1.6 The fees payable in relation to requests for access.

7.1.7 A reference to any regulations passed.



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- 7.2 The guide or any additional information may be requested from the South African Human Rights Commission at:

**Postal Address:** Private Bag 2700 Houghton 2041

**Telephone Number:** +27-11-877 3600

**Fax:** +27-11-403 0625

**Website:** [www.sahrc.org.za](http://www.sahrc.org.za)

## **8. Records available in terms of other Legislation**

### **8.1 Unlimited Requestors**

Records of a public nature, typically those disclosed on the Interfront's website and in its various annual reports, may be accessed without the need to submit a formal application. Other non-confidential records, such as statutory records maintained at CIPC, may also be accessed without the need to submit a formal application, however, please note that an appointment to view such records will still have to be made.


### **8.2 Limited Requestor**

For the purposes of this clause 8.2, "Personnel" refers to any person who works for, or provides services to, or on behalf of Interfront and receives or is entitled to receive remuneration and any other person who assist in carrying out or conducting the business of Interfront. This includes, without limitation, directors (executive and non-executive), all permanent, temporary and part-time staff, as well as contract workers. This clause serves as a reference to the categories of information that Interfront hold. The information is **classified** and grouped according to records relating to the following subjects and categories:





Subject	Category
<b>Companies Act Records</b>	Documents of Incorporation
	Index of Names of Directors
	Memorandum of Incorporation
	Minutes of the Board of Directors
	Minutes of Shareholder Meetings
	Proxy Forms
	Share Certificate
	Any other Statutory Records and/or Documents
	Special Resolutions / Resolutions passed at General Meetings
	Records relating to the appointment of:
	• Auditors
	• Directors
	• Prescribed Officers
	• Public Officer
	• Company Secretary
<b>Financial Records</b>	Accounting Records
	Asset Registers
	Bank Statements
	Banking Records
	Debtors / Creditors statements and invoices
	General Ledgers
	General Reconciliation
	Invoices
	Policies and Procedures
	Rental Agreements
	Tax Returns
<b>Income Tax Records</b>	PAYE Records
	Documents issued to Employees for Income Tax purposes
	Records of Payments made to SARS on behalf of Employees
	All other Statutory Compliance



	VAT
	Skills Development Levies
	UIF
	Workmen's Compensation
<b>Personnel Document and Records</b>	Accident Books and Records
	Address Lists
	Disciplinary Code and Records
	Employee Benefit Arrangements, Rules and Records
	Employee Contract
	Employment Equity Plan
	Forms and Applications
	Grievance Procedures
	Leave Records
	Medical Aid Records
	Payroll Reports
	Provident Fund Records
	Safety, Health and Environmental Records
	Salary Records
	SETA Records
	Standard Letters and Notices
	Training Manual
	Training Records
<b>Procurement Department</b>	Standard Terms and Conditions for supply of Services and Products
	Contractor, Client and Supplier Agreements
	Lists of Suppliers, Products and Services
	Policies and Procedures
	Information provided by Third Party
<b>Risk Management and Audit</b>	Audit Reports
	Risk Management Framework
	Risk Management Plans




<b>Safety, Health and Environment</b>	Complete Safety, Health and Environment Risk Assessment
	Management Plans
<b>IT Department</b>	Computer / Mobile Device Usage Policy Documentation
	Disaster Recovery Plans
	Hardware Asset Register
	Information Security Policies/Standards/Procedures
	Information Technology Systems and User Manuals
	Information Usage Policy Documents
	Project Implementation Plans
	Software Licensing
	Systems Documentation and Manuals
<b>Corporate Social Responsibility (CSR)</b>	CSR Schedule of Projects/Record of organisation/s that receive donations

**Note:** that the accessibility of the records may be subject to the grounds of refusal set out in this PAIA manual. Amongst other, records deemed confidential on the part of a third party, will necessitate permission from the third party concerned, in addition to normal requirements, before Interfront will consider access.

### 8.3 Applicable Legislation

Where applicable to its operations, Interfront also retains records and documents in terms of the legislation below. Unless disclosure is prohibited in terms of legislation, regulations, contractual agreement or otherwise, records that are required to be made available in terms of PAIA shall be made available for inspection by interested parties in terms of the requirements and conditions of PAIA; the below mentioned legislation and applicable internal policies and procedures, should such interested parties be entitled to such information. A request to access must be done in accordance with the prescriptions of PAIA.


- Basic Conditions of Employment Act, No 75 of 1997;
- Broad- Based Black Economic Empowerment Act, No 75 of 1997;



- Companies Act, No 71 of 2008;
- Compensation for Occupational Injuries & Diseases Act, 130 of 1993;
- Competition Act, No.71 of 2008;
- Constitution of the Republic of South Africa 2008;
- Copyright Act, No 98 of 1978;
- Electronic Communications Act, No 36 of 2005;
- Electronic Communications and Transactions Act No 25 of 2002;
- Employment Equity Act, No 55 of 1998;
- Financial Intelligence Centre Act, No 38 of 2001;
- Identification Act, No. 68 of 1997;
- Income Tax Act, No 58 of 1962;
- Intellectual Property Laws Amendment Act, No 38 of 1997;
- Labour Relations Act, No 66 of 1995;
- Occupational Health & Safety Act, No 85 of 1993;
- Prescription Act, No 68 of 1969;
- Prevention of Organised Crime Act, No 121 of 1998;
- Promotion of Access to Information Act, No 2 of 2000;
- Protection of Personal Information Act, No. 4 of 2013;
- Revenue laws Second Amendment Act. No 61 of 2008;
- Skills Development Levies Act No. 9 of 1999;
- Unemployment Insurance Contributions Act 4 of 2002;
- Unemployment Insurance Act No. 30 of 1966;
- Value Added Tax Act 89 of 1991. \*

*Although we have used our best endeavours to supply a list of applicable legislation, it is possible that this list may be incomplete. Whenever it comes to our attention that existing or new legislation allows a requestor access on a basis other than as set out in PAIA, we shall update the list accordingly. If a requestor believes that a right of access to a record exists in terms of other legislation listed above or any other*

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*legislation, the requestor is required to indicate what legislative right the request is based on, to allow Interfront the opportunity to consider the request in light thereof.*

It is further recorded that the accessibility of documents and records may be subject to the grounds of refusal set out in this PAIA Manual.

## **9. Form of Request**

- 9.1 The requestor must comply with all the procedural requirements contained in PAIA relating to the request for access to a record.
- 9.2 The requestor must complete the prescribed form, linked in Appendix 1 of this document, and submit same as well as payment of a request fee and a deposit (if applicable) to Interfront at the physical address as noted in clause 5 above.
- 9.3 The prescribed form must be filled in with sufficient information to enable Interfront to identify:
  - 9.3.1 the record or records requested; and
  - 9.3.2 the identity of the requestor.
- 9.4 The requestor should indicate which form of access is required and specify a postal address or fax number of the requestor in the Republic.
- 9.5 The requestor must state that he/she requires the information in order to exercise or protect a right, and clearly state what the nature of the right is so to be exercised or protected. The requestor must clearly specify why the record is necessary to exercise or protect such a right (section 53(2) (d)) of PAIA.



- 9.6 Interfront will process the request within 30 (thirty) days, unless the requestor has stated special reasons to the satisfaction of Interfront that circumstances dictate that the above time periods not be complied with.
- 9.7 The requestor shall be advised whether access is granted or denied in writing. If, in addition, the requestor requires the reasons for the decision in any other manner, the requestor will be obliged to state which manner and the particulars required.
- 9.8 If a request is made on behalf of another person, then the requestor must submit proof of the capacity in which the requestor is making the request to the reasonable satisfaction of Interfront as set out in section 53(2)(f) of PAIA.
- 9.9 If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally.
- 9.10 The requestor must pay the prescribed fee, before any further processing can take place.
- 9.11 All information as listed in this clause 9 should be provided and failing which the process will be delayed until the required information is provided. The prescribed time periods will not commence until the requestor has furnished all the necessary and required information.
- 9.12 Interfront shall sever a record, if possible, and grant only access to that portion requested and which is not prohibited from being disclosed.

## **10. Refusal of Access to Records**


- 10.1 Interfront is entitled to refuse a request for information, the main grounds for the refusal may relate to any of the following grounds:



- 10.1.1 mandatory protection of the privacy of a third party who is a natural or juristic person or a deceased person (section 63 of PAIA) or a juristic person, as included in the POPIA, which would involve the unreasonable disclosure of personal information of that natural or juristic person;
- 10.1.2 mandatory protection of personal information and for disclosure of any personal information to, in addition to any other legislative, regulatory or contractual agreements, in compliance with the provisions of POPIA;
- 10.1.3 mandatory protection of the commercial information of a third party (section 64 of PAIA) if the record contains:
  - 10.1.3.1 trade secrets of the third party;
  - 10.1.3.2 financial, commercial, scientific or technical information, which disclosure could likely cause harm to the financial or commercial interests of that third party;
  - 10.1.3.3 information disclosed in confidence by a third party to Interfront, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition;
  - 10.1.3.4 mandatory protection of confidential information of third parties (section 65 of PAIA) if it is protected in terms of any agreement;
  - 10.1.3.5 mandatory protection of the safety of individuals and the protection of property (section 66 of PAIA);



- 10.1.3.6 mandatory protection of records which would be regarded as privileged in legal proceedings (section 67 of PAIA).
- 10.1.4 The commercial activities (section 68 of PAIA) of Interfront, which may include:
  - 10.1.4.1 trade secrets of Interfront;
  - 10.1.4.2 financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of Interfront;
  - 10.1.4.3 information which, if disclosed could put Interfront at a disadvantage in negotiations or commercial competition;
  - 10.1.4.4 a computer program which is owned by Interfront and which is protected by copyright;
  - 10.1.4.5 the research information (section 69 of PAIA) of Interfront or a third party, if its disclosure would disclose the identity of Interfront, the researcher or the subject matter of the research and would place the research at a serious disadvantage.
- 10.2 Requests for information that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused.
- 10.3 All requests for information will be assessed on their own merits and in accordance with the applicable legal principles and legislation.



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10.4 If a requested record cannot be found or if the record does not exist, Interfront, by way of an affidavit or affirmation, will notify the requestor that it is not possible to give access to the requested record. Such a notice will be regarded as a decision to refuse a request for access to the record concerned for the purpose of PAIA. If the record should later be found, the requestor shall be given access to the record in the manner stipulated by the requestor in the prescribed form, unless Interfront refuses access to such record.

## **11. Remedies Available after Refusal**

### **11.1 Internal Remedies**

Interfront does not have internal appeal procedures. Requestors will have to exercise such external remedies at their disposal if the request for information is refused, and the requestor is not satisfied with the answer supplied by Interfront.


### **11.2 External Remedies**

Any requestor that is dissatisfied with Interfront's refusal to disclose information, may within 30 (thirty) days of notification of the decision, may apply to a Court for relief. For purposes of PAIA, the Courts that have jurisdiction over these applications are the Constitutional Court, the High Court or another court of similar status and a Magistrate's Court designated by the Minister of Justice and Constitutional Development and which is presided over by a designated Magistrate.

## **12. Prescribed Fees**


12.1 PAIA provides for two types of fees, namely:

12.1.1 a request fee, which is a form of administration fee to be paid by all requestors except personal requestors, before the request is considered and is not refundable; and



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- 12.1.2 an access fee, which is paid by all requestors in the event that a request for access is granted. This fee is inclusive of costs involved in obtaining and preparing a record for delivery to the requestor.
- 12.2 When the request is received by Interfront, Interfront shall by notice require the requestor, other than a personal requestor, to pay the prescribed request fee, before further processing of the request (section 54(1) of PAIA).
- 12.3 If the search for the record has been made and the preparation of the record for disclosure, including arrangement to make it available in the requested form, requires more than the hours prescribed in the regulations for this purpose, Interfront shall notify the requestor to pay as a deposit the prescribed portion of the access fee which would be payable if the request is granted.
- 12.4 Interfront shall withhold a record until the requestor has paid the fees as indicated below.
- 12.5 A requestor whose request for access to a record has been granted, must pay an access fee that is calculated to include, where applicable, the request fee, the process fee for reproduction and for search and preparation, and for any time reasonably required in excess of the prescribed hours to search for and prepare the record for disclosure including making arrangements to make it available in the requested format.
- 12.6 If a deposit has been paid in respect of a request for access, which is refused, then Interfront must repay the deposit to the requestor.



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### 13. Fees and Costs

#### 13.1 Reproduction Fees

Reproduction of Information Fees	Fees Payable
Information on a A4 page photocopy or part thereof	R1.10
A printed copy of an A4 page or part thereof	R0.75
A copy of a computer readable format, for example: Compact Disc	R70,00
A transcript of visual images on an A4 size page or part thereof	R40,00
A copy of visual images	R60,00
A transcription of an audio record on an A4 size page or part thereof	R20,00
A copy of an audio record	R30,00

#### 13.2 Request Fees

Where a requestor submits a request for access to information held by Interfront on a person other than the requestor himself/herself, a request fee in the amount of R50,00 (fifty rand) is payable up-front before Interfront will further process the request received.

#### 13.3 Access Fees

An access fee is payable in all instances where a request for access to information is granted, except in those instances where payment of an access fee is specially excluded in terms of PAIA or an exclusion is determined by the Minister in terms of section 54(8 of PAIA).

The applicable access fees which will be payable are:

Access of Information Fees	Fees Payable
Information on an A4 page photocopy or part thereof	R1,10
A printed copy of an A4 size or part thereof	R0,75
A copy of a computer readable format: Compact Disk	R70,00
A transcription of visual images in an A4 page or part thereof	R40,00
A copy of visual images	R60,00



A transcription of an audio record on a A4 page or part thereof	R20,00
A copy of an audio record *per hour or part thereof reasonably required for such search	R30,00
Where a copy of a record needs to be posted the actual postal fee is payable.	

#### **13.4 Deposit**

- 13.4.1 Where Interfront receives a request for access to information held on a person other than the requestor himself/herself and Interfront upon receipt of the request is of the opinion that the preparation of the required record of disclosure will take more than 6 (six) hours, a deposit is payable by the requestor.
- 13.4.2 The amount of the deposit is equal to 1/3 (one third) of the amount of the applicable access fee.


#### **13.5 Collection Fees**

- 13.5.1 The initial "request fee" of R50,00 (fifty rand) should be deposited into Interfront Bank account and a copy of the deposit slip, application form and other correspondence / documents, forwarded to Interfront via fax or email.
- 13.5.2 All fees are subject to change as allowed for in PAIA and as a consequence such escalations may not always be immediately available at the time of the request being made. Requestors shall be informed of any changes in the fees prior to making a payment.

### **14. Decision**

#### **14.1. Time Allowed**

- 14.1.1 Interfront will, within 30 (thirty) days of receipt of the request, decide whether to grant or decline the request and give notice with reasons (if required) to that effect.



14.1.2 The 30 (thirty) day period within which Interfront has to decide whether to grant or refuse the request, may be extended for a further period of not more than (30) thirty days if the request is for a large number of information, or the request requires a search for information held offsite and the information cannot reasonably be obtained within the original 30 (thirty) day period.

14.1.3 Interfront will notify the requestor in writing should an extension be sought.

## **15. Protection of Personal Information (POPIA)**

15.1 Chapter 3 of POPIA provides for the minimum Conditions for Lawful Processing of Personal Information by a Responsible Party. These conditions may not be derogated from unless specific exclusions apply as outlined in POPIA. Interfront requires Personal Information relating to both individual and juristic persons in order to carry out its business and organisational functions. The manner in which this information is processed and the purpose for which it is processed is determined by Interfront. Interfront is accordingly a Responsible Party for the purposes of POPIA and will ensure that the Personal Information of a Data Subject:

15.1.1 is processed lawfully, fairly and transparently. This includes the provision of appropriate information to Data Subjects when their data is collected by Interfront, in the form of privacy or data collection notices. Interfront must also have a legal basis (for example, consent) to process Personal Information;


15.1.2 is processed only for the purposes for which it was collected;

15.1.3 will not be processed for a secondary purpose unless that processing is compatible with the original purpose;

15.1.4 is adequate, relevant and not excessive for the purposes for which it was collected;




- 15.1.5 is accurate and kept up to date;
- 15.1.6 will not be kept for longer than necessary;
- 15.1.7 is processed in accordance with integrity and confidentiality principles; this includes physical and organisational measures to ensure that Personal Information, in both physical and electronic form, are subject to an appropriate level of security when stored, used and communicated by Interfront, in order to protect against access and acquisition by unauthorised persons and accidental loss, destruction or damage;
- 15.1.8 is processed in accordance with the rights of Data Subjects, where applicable. Data Subjects have the right to:
- 15.1.8.1 be notified that their Personal Information is being collected by Interfront. The Data Subject also has the right to be notified in the event of a data breach;
  - 15.1.8.2 know whether Interfront holds Personal Information about them, and to access that information. Any request for information must be handled in accordance with the provisions of this Manual;
  - 15.1.8.3 request the correction or deletion of inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained personal information;
  - 15.1.8.4 object to Interfront's use of their Personal Information and request the deletion of such Personal Information (deletion would be subject to Interfront's record keeping requirements);



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- 15.1.8.5 object to the processing of Personal Information for purposes of direct marketing by means of unsolicited electronic communications; and
  - 15.1.8.6 complain to the Information Regulator regarding an alleged infringement of any of the rights protected under POPIA and to institute civil proceedings regarding the alleged noncompliance with the protection of his, her or its personal information.
- 15.2 Personal Information may only be processed for a specific purpose. The purposes for which Interfront processes or will process Personal Information is set out in ***Part 1 of Appendix 2.***
- 15.3 As per section 1 of POPIA, a Data Subject may either be a natural or a juristic person. ***Part 2 of Appendix 2*** sets out the various categories of Data Subjects that Interfront Processes Personal Information on and the types of Personal Information relating thereto.
- 15.4 ***Part 3 of Appendix 2*** outlines the recipients to whom Interfront may provide a Data Subjects Personal Information to.
- 15.5 Section 72 of POPIA provides that Personal Information may only be transferred out of the Republic of South Africa if the:
- 15.5.1 recipient country can offer such data an “adequate level” of protection. This means that its data privacy laws must be substantially similar to the Conditions for Lawful Processing as contained in POPIA; or
  - 15.5.2 Data Subject consents to the transfer of their Personal Information; or



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- 15.5.3 transfer is necessary for the performance of a contractual obligation between the Data Subject and the Responsible Party; or
- 15.5.4 transfer is necessary for the performance of a contractual obligation between the Responsible Party and a third party, in the interests of the Data Subject; or
- 15.5.5 the transfer is for the benefit of the Data Subject, and it is not reasonably practicable to obtain the consent of the Data Subject, and if it were, the Data Subject, would in all likelihood provide such consent.
- 15.6 **Part 4 of Appendix 2** sets out the conditions that will apply for the cross border transfer of Personal Information.

## 16. Information Security Measures

**Part 5 of Appendix 2** sets out the types of security measures implemented or to be implemented by Interfront in order to ensure that Personal Information is respected and protected. A preliminary assessment of the suitability of the information security measures implemented or to be implemented by Interfront may be conducted in order to ensure that the Personal Information that is processed by Interfront is safeguarded and Processed in accordance with the Conditions for Lawful Processing.

## 17. Objection to the Processing of Personal Information

Section 11 (3) of POPIA and regulation 2 of the POPIA Regulations provides that a Data Subject may, at any time object to the Processing of his/her/its Personal Information in the prescribed form attached to this manual as **Appendix 3** subject to exceptions contained in POPIA.



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## **18. Request for Correction or Deletion**

Section 24 of POPIA and regulation 3 of the POPIA Regulations provides that a Data Subject may request for their Personal Information to be corrected/deleted in the prescribed form attached as **Appendix 4** to this Manual, subject to exceptions contained in POPIA.

## **19. Availability and Updating of the PAIA Manual**

19.1 This PAIA Manual is made available in terms of Regulation Number R.187 of 15 February 2002. Interfront will update this PAIA Manual at such intervals as may be deemed necessary.

19.2 This PAIA Manual of Interfront is available to view at its premises and on its website.



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## **Appendix 1: Access Request Form**

Use the link provided below to download the relevant document from the Department of Justice for completion and onward submission to Interfront

[https://www.justice.gov.za/forms/paia/J752\\_paia\\_Form%20C.pdf](https://www.justice.gov.za/forms/paia/J752_paia_Form%20C.pdf)



## **Appendix 2: Part 1 - Processing of Personal Information in Accordance with POPIA**

### **Employees:**


- Verification of applicant employees' information during recruitment process.
- General matters relating to employees:
  - Pension
  - Medical Aid
  - Payroll
  - Disciplinary Action
  - Training
  - Insurance
- Any other reasonably required purpose relating to the employment or possible employment relationship.

### **Vendors /Suppliers /Other Businesses:**

- Verifying information and performing checks.
- Purposes relating to the agreement or business relationship or possible agreement or business relationships between the parties.
- Payment of invoices.
- Complying with Interfront's regulatory and other obligations.
- Any other reasonably required purpose relating to Interfront business.


### **Clients**

- Performing duties in terms of any agreement with clients.
- Operate and manage client accounts and manage any agreement or correspondence the clients may have with Interfront.
- Communicating with clients by email, SMS, letter, telephone or in any other.
- Carrying out research, business and statistical analysis.
- Performing other administrative and operational purposes including the testing of systems.



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- Recovering any debt the clients may owe Interfront.
- Complying with Interfront's regulatory and other obligations.
- Any other reasonably required purpose relating to Interfront's business.



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## **Appendix 2: Part 2 - Categories of Data Subjects and Personal Information**

### **Employees**

- Name and Contact Details
- Identity Number and Identity Documents including Passports where applicable
- Employment History and References
- Banking and Financial Details
- Details of Payments to Third Parties (deductions from salary)
- Employment Contracts
- Employment Equity Plans
- Medical Aid Records including Medical Certificates and Reports
- Pension / Provident Fund Records
- Remuneration/Salary Records
- Performance Appraisals
- Disciplinary Records
- Leave Records
- Training records
- Details of Employees next of kin
- Assessments Other

### **Vendors /Suppliers /Other Businesses:**


- Name and contact details
- Identity and/or Company Information and Directors' Information
- Banking and Financial Information
- Information about Products or Services
- Other information not specified, reasonably required to be processed for business operations



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**Clients:**

- Postal and/or Street Address
- The title and name of Clients Representative/s
- Contact Numbers and/or e-mail address
- Financial Information



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## **Appendix 2: Part 3 - Recipients of Personal Information**

- Any firm, organisation or person that Interfront uses to collect payments and recover debts or to provide a service on its behalf.
- Any firm, organisation or person that/who provides Interfront with products or services.
- Any payment system Interfront uses.
- Regulatory and governmental authorities or ombudsmen, or other authorities, including tax authorities, where Interfront has a duty to share information.
- Third parties to whom payments are made on behalf of employees.
- Financial institutions from whom payments are received on behalf of data subjects.
- Any other operator not specified.
- Employees, contractors and temporary staff.
- Agents.



## **Appendix 2: Part 4 – Cross Border Transfer of Personal Information**

Personal Information may be transmitted cross border to Interfront's suppliers in other countries, and Personal Information may be stored in data servers hosted outside South Africa, which may not have adequate data protection laws. Interfront will endeavour to ensure that its service providers and suppliers will make all reasonable efforts to secure said data and Personal Information.





## **Appendix 2: Part 5 – Information Security Measures**

Interfront undertakes to institute and maintain the data protection measures to accomplish the following objectives outlined below. The details given are to be interpreted as examples of how to achieve an adequate data protection level for each objective. Interfront may use alternative measures and adapt to technological security development, as needed, provided that the objectives are achieved.

### **1. Access Control**

Interfront shall implement suitable measures in order to prevent unauthorised persons from gaining access to the data processing equipment where the data are processed.

### **2. Data Media Control**

Interfront undertakes to implement suitable measures to prevent the unauthorised manipulation of media, including reading, copying, alteration or removal of the data media used by Interfront and containing personal data of customers.

### **3. Data Memory Control**

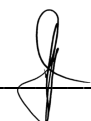
Interfront undertakes to implement suitable measures to prevent unauthorised input into data memory and the unauthorised reading, alteration or deletion of stored data.

### **4. User Control**

Interfront shall implement suitable measures to prevent its data processing systems from being used by unauthorised persons by means of data transmission equipment.

### **5. Access Control to Data**

Interfront represents that the persons entitled to use Interfront's data processing system are only able to access the data within the scope and to the extent covered by their respective access permissions (authorisation).



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## **6. Transmission Control**


Interfront shall be obliged to enable the verification and tracing of the locations / destinations to which the personal information is transferred by utilisation of Interfront's data communication equipment / devices.

## **7. Transport Control**

Interfront shall implement suitable measures to prevent Personal Information from being read, copied, altered or deleted by unauthorised persons during the transmission thereof or during the transport of the data media.

## **8. Organisation Control**

Interfront shall maintain its internal organisation in a manner that meets the requirements of this Manual.



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**Appendix 3: Objection to the Processing of Personal Information**  
**in terms of Section 11(3) of the Protection of Personal Information Act, 2013**  
**Regulations Relating to**  
**The Protection of Personal Information, 2018**

**Note:**

1. Affidavits or other documentary evidence as applicable in support of the objection may be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. Complete as is applicable

A	Details of Data Subject
<b>Name(s) and surname/ registered name of data subject:</b>	
<b>Unique Identifier/ Identity Number:</b>	
<b>Residential, postal or business address:</b>	
<b>Contact number(s):</b>	
<b>Fax number / E-mail address:</b>	
B	Details of Responsible Party
<b>Name(s) and surname/ registered name of data subject:</b>	
<b>Residential, postal or business address:</b>	
<b>Contact number(s):</b>	
<b>Fax number / E-mail address:</b>	




C	REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f) (Please provide detailed reasons for the objection)

Signed at ..... this ..... day of .....20...

.....

**Signature of data subject/designated person**



**Appendix 4: Request for Correction or Deletion of Personal Information**  
**in terms of Section 24(1) of the Protection of Personal Information Act, 2013**  
**Regulations Relating to the Protection of Personal Information, 2018 [Regulation 3]**

Note:

1. Affidavits or other documentary evidence as applicable in support of the request may be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. Complete as is applicable.


**Request for:**

Mark the appropriate box with an "x".

- ☐ Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.
- ☐ Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information

A	Details of Data Subject
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number:	
Residential, postal or business address:	
Contact number(s):	
Fax number / E-mail address:	

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<b>B</b>	<b>Details of Responsible Party</b>
<b>Name(s) and surname/ registered name of data subject:</b>	
<b>Residential, postal or business address:</b>	
<b>Contact number(s):</b>	
<b>Fax number / E-mail address:</b>	
<b>C</b>	<b>Reasons for Objection in Terms of Section 11(1)(D) to (F) (Please Provide Detailed Reasons for The Objection)</b>
<b>D</b>	<b>Reasons for Correction or Deletion of the Personal Information about the Data Subject in Terms of Section 24(1)(a) which is in Possession or Under the Control of the Responsible Party</b>
	<b>Destruction or Deletion of a Record of Personal Information about the Data Subject in Terms of Section 24(1) (b) which the Responsible Party is no longer Authorised to Retain. (Please Provide Detailed Reasons for the Request)</b>



Signed at ..... this ..... day of .....20...

.....

**Signature of data subject/designated person**



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