



PAIA MANUAL

ACCESS TO INFORMATION MANUAL PREPARED IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000 ("PAIA") FOR DIMENSION DATA MIDDLE EAST AND AFRICA (PROPRIETARY) LIMITED AND ITS WHOLLY OWNED TRADING SUBSIDIARY COMPANIES



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1. INTRODUCTION

PAIA requires the information officer of a private body to compile a manual that contains information on the records it holds. A 'private body' means a natural person, company or other type of juristic entity that carries on any trade, business or profession and includes a political party. We are a private body.

In terms of PAIA, Mr Alan Turnley-Jones (CEO) is the default Information Officer. Mr Alan Turnley-Jones has delegated the Information Officer duties and responsibilities to Miss Zandile Gabela, in her capacity as the Head of Regulatory Affairs.

The Dimension Data Group of Companies specialise in information technology and related services.

LIST OF WHOLLY OWNED TRADING SUBSIDIARIES:

Name of Company:	Registration number:
Internet Solutions Digital (Pty) Ltd	2000/021413/07
Britehouse Mobility (Pty) Ltd	1997/014442/07
Dimension Data Advanced Infrastructure (Pty) Ltd	2000/014542/07
Britehouse Automotive (Pty) Ltd	2000/027995/07
Synaq (Pty) Ltd	1966/005897/07

2. CONTACT DETAILS

DIMENSION DATA MIDDLE EAST AND AFRICA (PROPRIETARY) LIMITED AND ITS WHOLLY OWNED TRADING SUBSIDIARY COMPANIES (THE COMPANY)

Registration number:	2000/011209/07
Postal address:	Private Bag X127, Bryanston, 2021
Business address:	The Campus, 57 Sloane Street, Bryanston, 2021
Telephone number:	011 575 0000
Information officer:	Zandile Gabela
Information officer email:	Zandile.Gabela@dimensiondata.com
Website	www.dimensiondata.com



3. FURTHER GUIDANCE FROM THE INFORMATION REGULATOR

The Information Regulator has published a guide in terms of Section 10 of PAIA. The guide is available on their website, in each official language of South Africa. The guide explains how to exercise your rights under PAIA.

If you would like further guidance on how you can get access to information, you may contact the Information Regulator by directing any queries to:

Information Regulator

Postal address: P.O. Box 31533, Braamfontein, 2017

Physical address: JD House, 27 Stiemens Street, Braamfontein, 2001

Telephone number: 010 023 5207

Email for general enquiries: enquiries@infoeregulator.org.za

Email for complaints: PAIAComplaints@infoeregulator.org.za

Website: www.infoeregulator.org.za

4. RECORDS AVAILABLE IN TERMS OF ANY OTHER LEGISLATION

The Company keeps records that we are required to in terms of legislation applicable to the Company and its wholly owned trading subsidiaries. The legislation described below are not an exhaustive list that applies to the Company. The Company keeps records in terms of the following legislation:

4.1 Commercial

- Debtor Collectors Act 114 of 1998
- Income Tax Act 58 of 1962
- Insolvency Act 24 of 1936
- Insurance Act 27 of 1943
- Long Term Insurance Act 52 of 1998

4.2 Communications and IT

- Electronic Communications Act 36 of 2005
- Electronic Communications and Transactions Act 25 of 2002
- Financial Intelligence Centre Act 38 of 2001
- Financial Intelligence Centre Amendment Act 11 of 2008
- Regulation of Interception of Communications and Provision of Communication related Information Act 70 of 2002

4.3 Compliance and Corporate Governance

- Companies Act 61 of 1973
- Companies Act 71 of 2008
- Competition Act 89 of 1998



4.4 Intellectual Property

- Copyright Act 98 of 1978
- Intellectual Property Laws Amendment Act 38 of 1997
- Intellectual Property Laws Amendment Act 28 of 2013
- Trademarks Act 194 of 1993
- National Credit Act 34 of 2005
- Revenue Laws Amendment Act 60 of 2008
- Securities Transfer Tax Act 25 of 2007
- Securities Transfer Administration Act 26 of 2007
- Tax Administration Act 28 of 2011
- Value-added Tax Act 89 of 1991

4.5 Human Resources

- Basic Conditions of Employment Act 75 of 1997
- Broad Based Black Economic Empowerment Act 53 of 2003
- Compensation for Occupational Injuries and Disease Act 130 of 1993
- Employment Equity Act 55 of 1998
- Labour Relations Act 66 of 1995
- Occupational Health and Safety Act 85 of 1993
- Pension Funds Act 24 of 1956
- Protected Disclosures Act 26 of 2000
- Skills Development Act 97 of 1998
- Skills Development Amendment Act 37 of 2008
- Skills Development Levies Act 9 of 1999
- Unemployment Contributions Act 4 of 2002
- Unemployment Insurance Act 63 of 2001
- Unemployment Insurance Contributions Act 4 of 2002

4.6 General

- Arbitration Act 42 of 1965
- Consumer Protection Act 68 of 2008
- Prescription Act 18 of 1943
- Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000
- Promotion of Access to Information Act No 2 of 2000
- Protection of Personal Information Act 4 of 2013
- Regional Service Council Act 109 of 1985



5. ACCESS TO THE RECORDS HELD BY DIMENSION DATA

The Company holds the following subjects and categories of records in electronic or physical format, which we do not make automatically available.

5.1 Finance

- Accounting records
- Tax records
- VAT records
- PAYE records
- Debtors' records
- Creditors' records
- Insurance records
- Auditors' reports
- Annual financial statements
- Bank statements and other banking records
- Invoices

5.2 Administration

- Shareholder records
- Share register
- Dividend register
- Share certificates
- Minutes of meetings of directors
- Resolutions of the directors
- Applicable statutory documents, including certificates of incorporation and certificates to commence business;
- Memorandum of Incorporation
- Statutory returns to relevant authorities
- Trademark documentation

5.3 Corporate Governance

- Codes of Conduct
- Corporate social and investment records
- Minutes of meetings of committees and sub committees
- Executive committee meeting minutes
- Legal compliance records
- Company Policies

5.4 Human Resources

- Statistics regarding employees
- Employee personal information
- Employment applications and appointment letters
- Employment contracts
- Personnel records
- Records of Unemployment Insurance Fund contributions
- Records regarding group life assurance and disability income protection



- Provident fund records
- Payroll records
- Internal employment policies and procedures
- Disciplinary records
- Leave records
- Correspondence relating to personnel

5.5 Operations

- Supplier related records
- Agreements with suppliers
- Client information and records
- Agreements with clients
- Access control records
- Health and safety records
- Insurance documentation
- Travel documentation
- Vehicle registration documents
- Transaction details and supporting documentation
- Other third party contracts

5.6 Information Technology

- Computer software records
- Support and maintenance agreements
- Records regarding computer systems and programs

5.7 Property

- Asset registers
- Lease agreements in respect of immovable property
- Records regarding insurance in respect of movable property
- Records regarding insurance in respect of immovable property

5.8 Request Procedure

The Company has appointed our information officer to deal with all matters relating to PAIA so we can comply with our PAIA obligations.

5.8.1 The requester must use the prescribed form (Form 2) to request access to a record, which is available here: <https://info regulator.org.za/docs/forms/InfoRegSA-PAIA-Form02-Reg7.pdf>. A copy of this form is found under section 8 of this manual labelled 'Prescribed Forms'. This request must be made to the Information Officer. This request must be made to the address, or electronic mail address of the Company listed in section 1 above.

5.8.2 The requester must provide sufficient detail on the request form to enable the Information Officer to identify the record and the requester. This includes the requester's name, email address, postal address or fax number. The requester should also indicate which form of access is required. The requester should also indicate if, any other manner is to be used to inform the requester of our decision, in addition to a written reply. The requester must state the other manner.



- 5.8.3 The requester must identify the right that is sought to be exercised or protected and provide an explanation of why the requested record is required for the exercise or protection of that right.
- 5.8.4 If a request is made on behalf of another person, the requester must then submit proof of the capacity in which the requester is making the request to the satisfaction of the Information Officer.
- 5.8.5 If the requester does not use the prescribed form, the Company may:
- reject the request due to lack of procedural compliance,
 - refuse the request if the requester does not provide sufficient information, or
 - delay the request.

5.9 How the Company will give access

Our Information Officer will evaluate and consider all requests the Company receives. If our Information Officer approves your request, they will decide how to provide access to the requester – unless the requester has asked for access in a specific form. Publication of this manual does not give rise to any rights to access information records, except in terms of PAIA.

5.10 Fees

- 5.10.1 Every requester must pay the request fee prescribed by law.
- 5.10.2 The Information Officer must by notice require the requester to pay the prescribed fee, if any, before further processing the request. The notice will set out the application procedure.
- 5.10.3 The requester may complain to the Information Regulator or lodge an application to the court against the tender or payment of the request fee.
- 5.10.4 The requester will be notified in the required form as soon as the Information Officer has made a decision on the request.
- 5.10.5 If the request is granted, then a further access fee must be paid for reproduction and for search and preparation and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure.
- 5.10.6 Our Information Officer will notify the requester if the requester needs to pay a deposit for the access fee. The deposit may be up to one third of the prescribed access fee. The access fee will provide for:
- the costs of making the record, or transcribing the record,
 - a postal fee (if applicable), and
 - the reasonable time we need to search for the record and prepare the record for you.
- 5.10.7 If the requester paid the deposit and the Company refused the request, the Company will refund the deposit amount to the requester. Until the requester has paid the fees, the Company may withhold the requested record.
- 5.10.8 See section 8 of this manual labelled 'Fees' for more fee information.



5.10.9 The following subsidiaries are registered as vendors with the following VAT numbers under the Value-Added Tax Act 89 of 1991 and thus is entitled to charge VAT on all fees:

Name of Company:	VAT registration number:
Dimension Data (Proprietary) Limited	4560101117
Dimension Data Advanced Infrastructure (Pty) Ltd	4090194863
Britehouse Mobility (Pty) Ltd	4130205356
Britehouse Automotive (Pty) Ltd	4630199521
Internet Solutions Digital (Pty) Ltd	4130215983
Synaq (Pty) Ltd	

5.11 Grounds for us to refuse access

The Company may have to refuse you access to certain records in terms of PAIA to protect:

- someone else’s privacy,
- another company’s commercial information,
- someone else’s confidential information,
- research information,
- the safety of individuals and property, or
- records privileged from production in legal proceedings.

5.12 Decision on granting access

Our Information Officer will notify the requester in writing stating whether the request has been approved or denied within 30 calendar days after receiving the request. If the Company cannot find the record the requester asked for or such record does not exist, Information Officer will notify the requester by way of affidavit that it is not possible to give access to that record.

5.13 Remedies available if we refuse to give you access

If the request for access is denied, the requester may:

- apply to a court with appropriate jurisdiction, or
- complain to the Information Regulator, for the necessary relief within 180 calendar days of our Information Officer notifying therequester of their decision.

6. THE PROCESSING OF PERSONAL INFORMATION UNDER POPIA

Dimension Data processes personal information in accordance with its Privacy Policy, which is available on our website: www.dimensiondata.com. We collect personal information in order to provide our services and solutions, to conduct our business and to improve our products, services, and customer service. We process the personal information of various categories of data subjects for various purposes as set out in this



section and in terms of our Privacy Policy [click here](#) published on www.dimensiondata.com

6.1 Categories of data subjects

We process the personal information including the following categories of data subjects:

- customers or clients;
- prospects or leads;
- employees;
- contractors, vendors, or suppliers; and
- debtors and creditors

6.2 Processing Purposes

We process personal information for the following purposes:

- to send communications;
- to establish, manage, and maintain our business relationships;
- to respond to inquiries and requests;
- to develop, provide, and improve our services and solutions;
- to inform you about our services and solutions;
- to obtain feedback from you on our services and solutions;
- to provide you with a more personalised experience when you interact with us;
- to conduct administrative and business functions;
- to update our records and keep contact details up to date;
- to enable you to subscribe to our website, newsletters and mailing lists and to register for Dimension Data events, workshops and seminars;
- to process your application for employment with us, evaluate whether your qualifications may be suitable for other employment positions with Dimension Data, and for employment-related purposes if you are hired;
- to assess the performance of our websites and to improve their operation;
- to process and respond to privacy complaints;
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator; in co-operation with any governmental authority of any country; or as we otherwise believe to be necessary or appropriate under applicable law.



6.3 Categories of personal Information

The types of personal information we collect will depend on how you interact with Dimension Data. We process many different categories of personal information, including collect the following personal information:

- name;
- surname
- title or position;
- business address;
- e-mail address;
- phone number;
- fax number;
- information you provide to Dimension Data through customer surveys, and when you register for Dimension Data events and seminars.

We do not normally collect sensitive information about you such as information relating to your health, religion, political beliefs or race.

6.4 Third Party Disclosures

We may disclose your personal information to our affiliates. A list of Dimension Data affiliates is available at <http://www.dimensiondata.com/en-US/AboutUs/Pages/Dimension-Data-companies.aspx>.

We may also disclose your personal information to:

- contractors, suppliers, and other third parties who provide business, marketing, and other services to Dimension Data;
- a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets or stock; and
- regulators, courts/tribunals, and other governmental authorities of any country, or other recipients as we believe to be necessary or appropriate under applicable law.

Our websites may allow you to post questions or comments that will be viewable by other visitors. Please note that any such information may be available to the general public.

We do not provide your personal information to unaffiliated third parties for their third-party direct marketing purposes.



6.5 Cross Boarder Transfers

Your personal information may be stored and processed in any country where Dimension Data has facilities or where we engage service providers. Some of these countries may have different data protection rules than your country of residence.

6.6 Security

We seek to take reasonable precautions to protect personal information from misuse, loss, unauthorised access, modification or disclosure using a combination of physical, administrative and technical safeguards.

7. OTHER INFORMATION AS MAY BE PRESCRIBED

The Minister of Justice and Constitutional Development has not made any regulations in this regard.

8. AVAILABILITY OF THE MANUAL

This manual is available for inspection by the general public upon request, during office hours and free of charge, at the offices of the Company and its wholly owned trading subsidiary companies. This manual is also electronically available on our website at: www.dimensiondata.com

9. PRESCRIBED FORMS AND FEE STRUCTURE IN RESPECT OF PRIVATE BODIES

All forms prescribed under PAIA, and other related documents are available at the Information Regulator's website (www.inforegulator.org.za) under the "Documents" section.

Item	Description	Amount in Rand
1.	Request fee, payable by every requester	R140.00
2.	Photocopy or printed black & white copy for every A4 page	R2.00 per page or part of page
3.	Printed copy of A4-size page	R2.00 per page or part of page
4.	For a copy in a computer-readable form on: <ul style="list-style-type: none">Flash drive (provided by the requester)compact disc (CD)<ul style="list-style-type: none">i. if provided by requesterii. if provided to requester	R40.00 R40.00 R60.00
5.	For a transcription of visual images, for an A4-size page or part of page	This service will be outsourced. The fee will depend on quotation from service provider.
6.	For a copy of visual images	This service will be outsourced. The fee will depend on quotation from service provider.
7.	For a transcription of an audio record, per A4-size page	R24.00
8.	For a copy of an audio record on:	



	<ul style="list-style-type: none">Flash drive (provided by the requester)Compact disc (CD)<ul style="list-style-type: none">i. if provided by requesterii. if provided to requester	R40.00 R40.00 R60.00
9.	For each hour or part of an hour (excluding the first hour) reasonably required to search for, and prepare the record for disclosure	R145.00
	The search and preparation fee cannot exceed	R435.00
10.	Deposit: If the search exceeds 6 hours	One third of the amount per request. Calculated in terms of items 2 to 8 above.
11.	Postage, email or any other electronic transfer	Actual expense, if any.

10. UPDATES TO THIS MANUAL

The Company will update this manual whenever there are material changes to it.



11.PRESCRIBED FORMS

REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY (Section 53(1) of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000))

[Regulation 10]

A. Particulars of private body

The Head:

B. Particulars of person requesting access to the record

- (a) *The particulars of the person who requests access to the record must be given below.*
- (b) *The address and/or fax number in the Republic to which the information is to be sent must be given.*
- (c) *Proof of the capacity in which the request is made, if applicable, must be attached.*

Full names and surname:

Identity number:

Postal address:

Fax number: _____ Telephone number:

E-mail address:

Capacity in which request is made, when made on behalf of another person:

D. Particulars of record

- (a) *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.*
- (b) *If the provided space is inadequate, please continue on a separate folio and attach it to this form. **The requester must sign all the additional folios.***

1. **Description of record or relevant part of the record:**
2. **Reference number, if available:**
3. **Any further particulars of record**

E. Fees

- (a) *A request for access to a record, other than a record containing personal information about yourself, will be processed only after a **request fee** has been paid.*
- (b) *You will be notified of the amount required to be paid as the request fee.*
- (c) *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.*
- (d) *If you qualify for exemption of the payment of any fee, please state the reason for exemption.*

Reason for exemption from payment of fees:



F. Form of access to record

If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the record is required.

Disability:	Form in which record is required:
<p>Mark the appropriate box with an X.</p> <p>NOTES:</p> <p>(a) Compliance with your request in the specified form may depend on the form in which the record is available.</p> <p>(b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.</p> <p>(c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.</p>	

1. If the record is in written or printed form:			
copy of record*	<input type="checkbox"/>	inspection of record	
2. If record consists of visual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.):			
view the images	<input type="checkbox"/>	copy of the images*	transcription of the images*
3. If record consists of recorded words or information which can be reproduced in sound:			
listen to the soundtrack (audio cassette)	<input type="checkbox"/>	transcription of soundtrack* (written or printed document)	
4. If record is held on computer or in an electronic or machine-readable form:			
printed copy of record*	<input type="checkbox"/>	printed copy of information derived from the record*	copy in computer readable form* (stiffy or compact disc)
*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable.		YES	NO

G. Particulars of right to be exercised or protected

*If the provided space is inadequate, please continue on a separate folio and attach it to this form. **The requester must sign all the additional folios.***

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



H. Notice of decision regarding request for access

You will be notified in writing whether your request has been approved/denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the record?

Signed at _____ this _____ day of _____ 20

SIGNATURE OF REQUESTER / PERSON
ON WHOSE BEHALF REQUEST IS MADE _____