

# PAIA MANUAL

## Future Managers (Pty) Ltd

("the Company")

Prepared in accordance with Section 51 of PROMOTION OF ACCESS TO INFORMATION ACT, ACT 2 OF 2000 and the PROTECTION OF PERSONAL INFORMATION ACT, Act 4 of 2013

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31/08/2021

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31/08/2021

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3.9.2021

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## INTRODUCTION TO FUTURE MANAGERS

Future Managers was born out of a vision to add real value to people development throughout Southern Africa. Formally starting as a college publisher in 1997 with a wide range of NATED textbooks and lecturer guides for TVET Colleges, Future Managers has expanded to include NCV titles which are in high demand and publishes niche technology focused textbooks for the FET school curriculum. Their practical, relevant, high-quality learning material deploys digital platforms to complement the traditional offering to enable an enhanced teaching and learning experience, for students and lecturers.

### 1 INFORMATION IN TERMS OF SECTION 51

#### *Contact details [Section 51(1)(a)]*

Registration number	<b>1987/000363/07</b>
Postal address:	<b>PO Box 13194</b> <b>Mowbray</b> <b>7705</b>
Street address:	<b>160 Sir Lowry Road</b> <b>Buchanan Square</b> <b>The Armoury, Ground Floor</b> <b>Woodstock</b> <b>7925</b>
Phone number:	<b>+27 (0)21 462 3572</b>
Fax number:	<b>+27 (0)21 462 3681</b>
Email address:	<b>info@futuremanagers.com</b>
Website:	<b>www.futuremanagers.com</b> <b>distance.futuremanagers.com</b> <b>www.mathstudyguides.co.za</b>
Information Officer	
Name:	<b>Ryk Cloete</b>
Email:	<b>ryk@futuremanagers.com</b>

## 2 THE SECTION 10 GUIDE ON HOW TO USE THE ACT [SECTION 51(1)(B)]

- 2.1 The PAIA Act grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest.
- 2.2 Requests in terms of the PAIA Act shall be made in accordance with the prescribed procedures, at the rates provided. The forms and tariff are dealt with in paragraphs 6 and 7 of the Act.
- 2.3 The Guide is available from the South African Human Rights Commission. Please direct any queries to:

The South African Human Rights Commission - PAIA Unit The Research and Documentation Department

Postal address: Private Bag 2700  
Houghton  
2041

Telephone: +27 11 484-8300

Fax: +27 11 484-7146

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

## 3 CATEGORIES OF RECORDS WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS IN TERMS OF THE ACT IN TERMS OF SECTION 52(2) [SECTION 51(1)(B)(II)]

No notice of such records has been made to the Minister.

## 4 RECORDS AVAILABLE IN TERMS OF ANY OTHER LEGISLATION [SECTION 51(1)(B)(III)]

Records are kept in accordance with the following legislation:

- Basic Conditions of Employment No. 75 of 1997
- Companies Act No. 71 of 2008
- Companies Amendment Act No 3 of 2011
- Compensation for Occupational Injuries and Health Diseases Act No.130 of 1993
- Copyright Act No 98 of 1978
- Electronic Communications and Transactions Act No 25 of 2002
- Employment Equity Act No 55 of 1998



- Financial Advisory and Intermediary Services Act No 37 of 2002
- Income Tax Act No. 95 of 1967
- Labour Relations Act No 66 of 1995
- Promotion of Access of Information Act No 2 of 2000
- Skills Development Levies Act No. 9 of 1999
- Skills Development Act No. 97 of 1998
- Unemployment Contributions Act No. 4 of 2002
- Unemployment Insurance Act No. 63 of 2001
- Value Added Tax Act No. 89 of 1991

**5 ACCESS TO THE RECORDS HELD BY THE PRIVATE BODY IN QUESTION [SECTIONS 51(1)(B)(III)]**

Records that may be requested. A description of the subjects of the records held by the body and the categories in which these subjects are classed [Section 51(1)(b)(iii)]

**5.1 Company record classification key**

<b>Classification</b>	<b>Access</b>	<b>Classification (PAIA section)</b>
1	May be disclosed	Public Access Document
2	May not be disclosed	Request after commencement of criminal or civil proceedings [Section 7]
3	May be disclosed	Subject to copyright
4	Limited disclosure	Personal information of Natural Persons that belongs to the requestor of that information, or personal information of Juristic Persons represented by the requestor of that information [Section 61]
5	May not be disclosed	Unreasonable disclosure of personal information of Natural Person [Section 63(1)] or Juristic Person [POPI]

<b>Classification</b>	<b>Access</b>	<b>Classification (PAIA section)</b>
6	May not be disclosed	Likely to harm the commercial or financial interests of third party [Section 64(1)(a) and (b)]
7	May not be disclosed	Likely to harm the Company or third party in contract or other negotiations [Section 64(1)(c)]
8	May not be disclosed	Would breach a duty of confidence owed to a third party in terms of an Agreement [Section 65]
9	May not be disclosed	Likely to compromise the safety of individuals or protection of property [Section 66]
10	May not be disclosed	Legally privileged document [Section 67]
11	May not be refused	Environmental testing / investigation which reveals public safety / environmental risks [Section 64(2); Section 68(2)]
12	May not be disclosed	Commercial information of Private Body [Section 68]
13	May not be disclosed	Likely to prejudice research and development information of the Company or a third party [Section 69]
14	May not be refused	Disclosure in public interest [Section 70]

## 5.2 Company record availability

Departmental records	Subject	Classification
Human Resources	Employee records/Information	4, 5, 9/10
	Employee contracts	4, 5
	Personnel guidelines, Policies and Procedures	12
	Employee medical records	4, 5, 8
	Employee disability insurance records	4, 5
	Employee pension and provident fund records	4, 5
	Payroll records	4, 5
	Recruitment records	4, 5
	Health and safety records (employees, contractors)	
Sales and Marketing	Current product information	1, 4
	Public corporate records	1
	Launches and events records	4, 5
	Market information	12, 13
	Product brochures	1
	Marketing and future product strategies	12

<b>Departmental records</b>	<b>Subject</b>	<b>Classification</b>
<b>Administration</b>	Customer records/information	4, 5/10
	Processing records	4, 5
	Physical security records (visitors, suppliers, contractors, employees)	4, 5
	Electronic access and identity management records (employees, contractors)	4, 5
<b>Operations</b>	Production records	12
	Supplier records/information	4, 5/10
	Product specifications	12, 13
<b>Finance</b>	Audited financial statements	12
	Tax records (company, employee)	4, 12
	Asset register	12
	Management accounts	12
	Immovable property records	12
	Statutory records	12
<b>Innovation</b>	Customer information and database	4, 5, 12
	General contract documentation	6, 12
	Company guidelines, policies and procedures	12
	Complaints and investigations records	4, 5

## 6 PROTECTION OF PERSONAL INFORMATION [SECTION 51(1)(C)]

### 6.1 *Purpose of Processing*

The Company collects and uses personal information to:

- to provide or manage any information, products and/or services requested by data subjects;
- to help us identify data subjects when they contact the Company;
- to maintain customer records;
- for recruitment purposes;
- for employment purposes;
- for travel purposes;
- for general administration, financial and tax purposes;
- for legal or contractual purposes;
- for health and safety purposes;
- to monitor access, secure and manage our premises and facilities;
- to transact with our suppliers and business partners, including BMW dealerships;
- to help us improve the quality of our products and services;
- to help us recover debts;
- to carry out analysis and customer profiling; and
- to identify other products and services which might be of interest to data subjects and to inform them about our products and services.

### 6.2 *A description of the categories of data subjects and of the information or categories of information relating thereto*

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

<b>Categories of Data Subjects</b>	<b>Personal Information processed</b>
Customers and potential customers	Personal information
	Contracts
	Location information
Suppliers	Personal information
	Personal information of representatives

<b>Categories of Data Subjects</b>	<b>Personal Information processed</b>
Employees	Personal information
	Medical information
	Disability information
	Pension and provident fund information
	Contracts
	Performance records
	Payroll records
	Electronic access records
	Physical access 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

**6.3 *The recipients or categories of recipients to whom the personal information may be supplied***

The Company may share the information of our data subjects for any of the purposes outlined in paragraph 6.1 above, with our service providers and agents who perform services on our behalf.

We do not share the personal information of our data subjects with any third parties, except if:

- we are obliged to provide such information for legal or regulatory purposes;
- we are required to do so for purposes of existing or future legal proceedings,
- we are selling one or more of our businesses to someone to whom we may transfer our rights under any customer agreement we have with you;
- we are involved in the prevention of fraud, loss, bribery or corruption;
- they perform services and process personal information on our behalf;
- this is required to provide or manage any information, products and/or services to data subjects; or
- needed to help us improve the quality of our products and services.

6.4 ***Planned transborder flows of personal information***

No planned transborder flows of personal information.

6.5 ***The suitability of the information security measures to be implemented to ensure confidentiality, integrity and availability of the information which is to be processed***

Reasonable technical and organisational measures have been implemented for the protection of personal information processed by the Company and its operators. In terms of POPIA, operators are third parties that process personal information on behalf of the Company.

We continuously implement and monitor technical and organisational security measures to protect the personal information we hold, against unauthorised access, as well as accidental or wilful manipulation, loss or destruction.

We will take steps to ensure that operators that process personal information on behalf of the Company apply adequate safeguards as outlined above.

## **7 THE REQUEST PROCEDURES**

### ***7.1 Form of request:***

7.1.1 The requester must use the prescribed form (available on the website of the South African Human Rights Commission at [www.sahrc.org.za](http://www.sahrc.org.za)) to make the request for access to a record. This must be made to the Company Information officer. This request must be made to the address, fax number or electronic mail address of the body concerned [s 53(1)].

7.1.2 The requester must provide sufficient detail on the request form to enable the Information Officer to identify the record and the requester. 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 and state the necessary particulars to be so informed [s 53(2)(a) and (b) and (c)].

7.1.3 The requester must identify the right that is sought to be exercised or to be protected and provide an explanation of why the requested record is required for the exercise or protection of that right [s 53(2)(d)].

7.1.4 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 [s 53(2)(f)].

## 8 FEES:

8.1 A requester who seeks access to a record containing personal information about that requester is not required to pay the request fee. Every other requester, who is not a personal requester, must pay the required request fee:

8.2 The Information Officer must notify the requester (other than a personal requester) by notice, requiring the requester to pay the prescribed fee (if any) before further processing the request [s 54(1)].

8.3 The fee that the requester must pay to a private body is R50. The requester may lodge an application to the court against the tender or payment of the request fee [s 54(3)(b)].

8.4 After the Information Officer has made a decision on the request, the requester must be notified in the required form.

8.5 If the request is granted then a further access fee must be paid for the search, reproduction, preparation and for any time that has exceeded the prescribed hours (6 hours) to search and prepare the record for disclosure [s 54(6)].

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

8.7 The fee structure is available on the website of the South African Human Rights Commission at [www.sahrc.org.za](http://www.sahrc.org.za). [www.sahrc.org.za](http://www.sahrc.org.za).

## 9 AVAILABILITY OF THE MANUAL [SECTION 51(3)]

9.1 This manual is available from the South African Human Rights Commission [www.sahrc.org.za](http://www.sahrc.org.za) (see details above) and in electronic format at [www.futuremanagers.com](http://www.futuremanagers.com).

9.2 The Company will update this PAIA Manual at such intervals as may be deemed necessary.