



**Jasco Electronics Holdings Limited
Protection and Access to Information
Manual**

1. Introduction

1.1. Overview

The Promotion of Access to Information Act (“PAIA” or “Act”), 2 of 2000 was assented to on the 2nd of February 2000 and came into effect on 9 March 2001. This Act gives effect to the constitutional right of access to any information held by the State and private bodies and promoted the exercise or protection of any rights to information.

This Act applies to the exclusion of any provision of other legislation that-

- a. prohibits or restricts the disclosure of a record of a public body or private body; and
- b. is materially inconsistent with an object, or a specific provision, of this Act.

PAIA fosters a corporate culture of transparency and accountability, within the context of the protection of personal information. In this regard, the provisions of the Protection of Personal Information Act 4 of 2013 (“POPIA”) are also relevant whenever a request for information is received.

In terms of PAIA, if a person other than a government department or agency requests information from a private body, such information may only be provided if:

- a. the information is requested to protect a right;
- b. the person requesting the information complied with the procedural requirements of that private body relating to such requests for information; and
- c. there is no ground on which to refuse access to such information.

With the above provisions in mind, the Act requires private bodies to compile a PAIA manual to assist in the exercise of the right to information.

In terms of Section 51 of the Act, a private body must, within 6 months of coming into existence, compile a PAIA Manual, unless exempted by the Minister of Justice and Correctional Services.

This manual is published on the Company website at jasco.co.za or alternatively, a copy can be requested from the Jasco Information Officer (see contact details in section 3).

1.2. Reference Documents

- [1] JEHL Data Subject Request Form, document no: [JG-Internal-TMP-023](#)

1.3. Abbreviations and Acronyms

Data	means all information in any form that is owned or processed; it includes but is not limited to facts, numbers, letters and symbols collected by various means and processed to produce information.
GDPR	General Data Protection Regulation
IO	Information Officer
JEHL	Jasco Electronics Holdings Limited and all of its subsidiaries, affiliates and business employees (i.e. employees, directors, senior managers, executives, temporary staff members, agents, consultants, seconded, home-based, casual and agency staff, volunteers and interns), JEHL business associates and partners.
Personal Information	Means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person for example a company including, but not limited to: <ul style="list-style-type: none"> a. Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person; b. Information relating to the education or the medical, financial, criminal or employment history of the person; c. any identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assignments to the person; d. the biometric information of the person; e. the personal opinions, views or preferences of the person; f. correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence; g. the views or opinions of another individual about the person; h. the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person; i. Name, address, contact details, tax number, registration number, price lists, director details, quotes, invoices, sales order etc of companies.
POPIA	Protection of Personal Information Act
Processing	means any operation, or set of operations, performed on data, by any means, such as by collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction and "Processing" shall have a corresponding meaning.
Special Personal Information	Means the following information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person for example a company:

	<ul style="list-style-type: none"> a. the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a data subject; or b. the criminal behaviour of a data subject the extent that such information relates to <ul style="list-style-type: none"> i. the alleged commission by a data subject of any offence; or ii. any proceedings in respect of an offence allegedly committed by a data subject or the disposal of such proceedings.
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1.4. Version Information

Version	Reason for Change	Date
1.0	Approved Document	30 June 2021

2. Who may Request Access to Information

In terms of section 1 of PAIA, a requester, in relation to a private body, means:

- a. any person, including, but not limited to, a public body or an official thereof, making a request for access to a record of that private body; or
- b. a person acting on behalf of the person contemplated in subparagraph (a).

The above means that a requester may act on behalf of a person in making a request for a record.

In terms of section 53(2)(d) of the Act, a request for access must at least require the requester concerned to identify the right the requester is seeking to exercise or protect and provide an explanation of why the requested record is required for the exercise or protection of that right.

In essence, PAIA provides that a requester will be entitled to access to a record if the record is required for the exercise or protection of a right.

Requests can be made:

- a. as a personal requester;
- b. an agent of a requester on behalf of someone else
- c. as a third party seeking information.

3. Contact Details of Information Officer

Name	Warren Prinsloo
Physical Address	Cnr Alexandra Avenue and 2nd Street Halfway House 1685 South Africa
Postal Address	PO Box 860 Wendywood South Africa 2144
Tel	+27 11 266 1500
Email	popia@jasco.co.za

4. SAHRC Guidance to Requesters on how to Use the Act

The South African Human Rights Commission (“SAHRC”) published guidelines in terms of section 10 of the Act that will facilitate ease of use of the Act for requesters.

The guide to the Act can be obtained below:

Postal Address
South African Human Rights Commission Promotion of Access to Information Act Unit Private Bag 2700 Houghton Johannesburg 2041
Physical Address
Forum 3 Braampark Office Park Braamfontein
Queries can be directed to
Telephone number: 27 (0) 11 877 3600 Fax number: (011) 484 7146/7 Website: www.sahrc.org.za E-mail: PAIA@sahrc.org.za

5. Company Structure

5.1. Scope

This PAIA Manual has been prepared for Jasco Electronics Holdings Limited (JEHL) and the following JEHL Subsidiaries:

- a. Jasco Trading (Pty) Ltd
- b. DataVoice (Pty) Ltd
- c. Jasco Enterprise (Pty) Ltd
- d. Jasco Power Solutions (Pty) Ltd
- e. Jasco Carrier Solutions (Pty) Ltd
- f. Jasco Security and Fire Solutions (Pty) Ltd
- g. Jasco Systems (Pty) Ltd
- h. Jasco Trading (Pty) Ltd t/a Webb Industries
- i. NewTelco South Africa (Pty) Ltd
- j. Jasco Networks (Pty) Ltd

The following JEHL subsidiaries are excluded from this PAIA Manual:

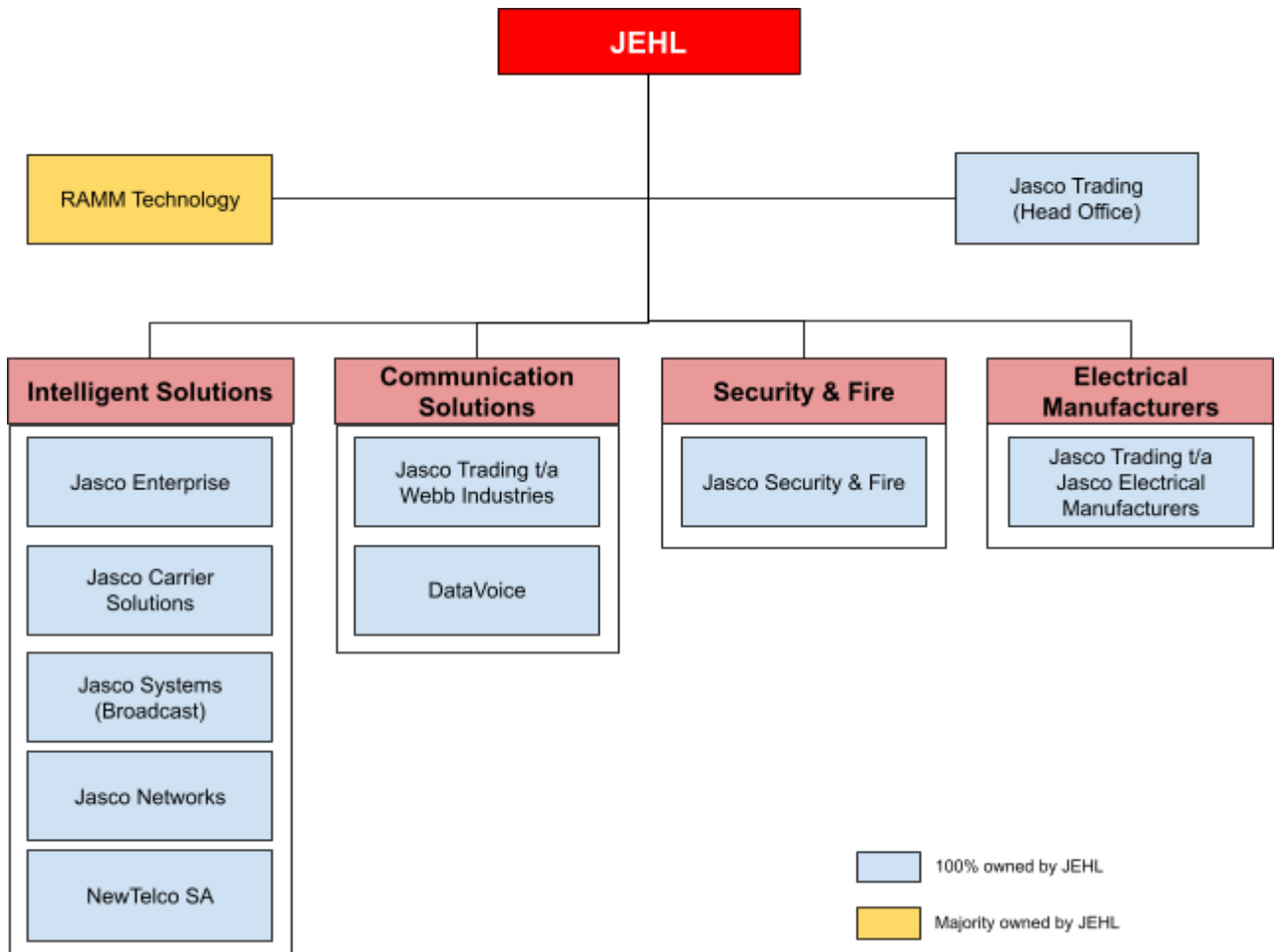
- a. RAMM Systems t/a RAMM Technology Pty (Ltd)

This manual is intended to ensure that JEHL complies with the Act by fostering the culture of transparency and accountability and giving effect to the right to information.

5.2. Company Profile

The Jasco Group is a smart technology and solutions partner. Jasco provides a range of true end-to-end converged ICT offerings for carriers and enterprises across the telecoms, communications, IT infrastructure, security and fire sectors. Jasco's offering also incorporates intelligent technologies including power and renewable energy, water management, data centres and broadcasting. It also offers component manufacturing of injection-moulded plastic, pressed metal components and appliances for the 'white goods' industry.

5.3. Company Organisation Structure



6. Classes of Records

6.1. Records automatically available to the Public - Sec 51 (1) (c)

Please note that a description of the category of records has to be submitted to the Minister in terms of section 52(1) of the Act for publication.

In general terms, the following records are automatically available at the office of JEHL on payment of the prescribed fee for reproduction:

- a. Documentation and information relating to JEHL which is held by the Companies and Intellectual Properties Commission in accordance with the requirements set out in section 25 of the Companies Act 71 of 2008.
- b. Product/Solution/Services and Promotional Brochures
- c. News and other Marketing Information

- d. The annual integrated report and any other shareholder communications as published on JEHL's website.

6.2. Records available in accordance with other legislation - Sec 51

(1) (d)

Where applicable to its operation, JEHL also retains records and documents in terms of legislation listed below. Please note that the records listed below are not exhaustive and as such, each request for access to the record will be treated uniquely with consideration of applicable legislation, procedure and policy.

Records kept in accordance with such other legislation as applicable to JEHL which includes, but is not limited to:

- a. Banks Act 94 of 1990
- b. Basic Conditions of Employment Act 75 of 1997
- c. Broad-Based Black Economic Empowerment Act 53 of 2003
- d. Civil Proceedings Evidence Act, 1965 (Act 25 of 1965)
- e. Companies Act 71 of 2008
- f. Compensation for Occupational Injuries and Diseases Act 130 of 1993
- g. Competition Act 89 of 1998
- h. Constitution of South Africa Act 108 of 1996
- i. Copyright Act 98 of 1987
- j. Consumer Protection Act 68 of 2008
- k. Criminal Procedure Act 51 of 1977
- l. Customs and Excise Act, 1964
- m. Deeds Registries Act 57 of 1937
- n. Debt Collectors Act 114 of 1998
- o. Electronic Communications and Transactions Act 25 of 2002
- p. Employment Equity Act 55 of 1998
- q. Finance Act 2 of 2007
- r. Income Tax Act 58 of 1962
- s. Insider Trading Act 135 of 1998
- t. Insolvency Act 24 of 1936
- u. Labour Relations Act 66 of 1995
- v. Long Term Insurance Act 52 of 1998
- w. Magistrates Court Act 32 of 1944
- x. Non-Profit Organisations Act 71 of 1997
- y. Occupational Health and Safety Act 85 of 1993
- z. Patents Act 57 of 1987
- aa. Pension Funds Act 24 of 1956
- bb. Prevention of Organised Crime Act 14 of 1998
- cc. Protection of Information Act, No. 84 of 1982
- dd. Regulation of Interception of Communications and Provision of Communication Related Information Act 70 of 2002
- ee. Securities Services Act 36 of 2004
- ff. Short Term Insurance Act. 53 of 1998
- gg. Skills Development Act 97 of 1998

- hh. Skills Development Levies Act 97 of 1999
- ii. South African Revenue Service Act 34 of 1997
- jj. Statistics Act 6 of 1999
- kk. Tax on Retirement Funds Act No 38 of 1996
- ll. Trust Property Control Act 57 of 1988
- mm. Unemployment Insurance Act 63 of 2001
- nn. Value Added Tax Act 89 of 1991

Although JEHL has used its best endeavours to supply you with a list of applicable legislation it is possible that the above list may be incomplete.

Wherever it comes to JEHL's attention that existing or new legislation allows a requester access on a basis other than that set out in the Act, we shall update the list accordingly.

6.3. Records held by JEHL - Record Subjects and Categories

Function	Records
Corporate Affairs and Investor Relations / Communications	<ul style="list-style-type: none"> - Media Releases - Newsletters and Publications - Corporate Social Investment - Public Corporate Records - SENS releases
Corporate Secretariat and Governance	<ul style="list-style-type: none"> - Applicable Statutory Documents - Annual Reports - Board of Directors and Board Committee Terms of Reference - Codes of Conduct - Executive Committee Meeting Minutes - Legal Compliance Records - Memoranda of Incorporation - Minutes of Board of Directors and Board Committee Meetings - Minutes of Shareholders' Meetings - Group Policies and Procedures - Share Certificates - Shareholder Agreements - Strategic plans - Statutory Returns to Relevant Authorities

Finance and Taxation	<ul style="list-style-type: none"> - Policies and Procedures - Accounting Records - Annual Financial Statements - Audit Reports - Capital Expenditure Records - Investment Records - Invoices and Statements - Management Reports - Purchasing Records - Sale and Supply Records - Tax Records and Returns - Treasury Dealing - Transactional Records
Human Resources	<ul style="list-style-type: none"> - Education and Training Records - Employee Benefit Records - Employment Contracts - Employment Equity Records - Employee Information - Employee Share Option Scheme - Policies and Procedures - Group Life - Leave Records - Medical Records - Pension and Retirement Funding Records - Study assistance scheme/s - Tax Returns of employees - UIF Returns
Information Technology	<ul style="list-style-type: none"> - Agreements - Disaster Recovery - Hardware and Software Packages - Policies and Procedures - Internal Systems Support and Programming - Licenses - Operating Systems
Intellectual Property	<ul style="list-style-type: none"> - Trademark applications - Agreements relating to intellectual property - Copyrights

Legal	<ul style="list-style-type: none"> - Complaints, pleadings, briefs and other documents pertaining to any actual or pending litigation, arbitration or investigation - Material licenses, permits and authorisations
Sales, Marketing and Communication	<ul style="list-style-type: none"> - Brochures, Newsletters and Advertising Material - Client Information - Marketing Brochures - Marketing Strategies - Product Brochures - Policies and Procedures

7. Processing Personal Information in terms of POPI Act

7.1. Processing Personal Information

JEHL processes personal information of data subjects for the purposes of: Sec 51 (1)(c)(i)

- a. Fulfilling its statutory obligations in terms of applicable legislation;
- b. Verifying information provided to JEHL;
- c. Obtaining information necessary to provide contractually agreed services to a customer;
- d. Monitoring, maintaining and managing JEHL’s contractual obligations to customers, clients, suppliers, service providers, employees, directors and other third parties;
- e. Marketing and advertising;
- f. Resolving and tracking complaints;
- g. Monitoring and securing the assets, employees and visitors to the premises of JEHL;
- h. Historical record-keeping, research and recording statistics necessary for fulfilling JEHL’s business objectives.

7.2. Processing Personal Information Categories

JEHL may process the personal information of the following categories of data subjects, which includes current, past and prospective data subjects: Sec 51 (1)(c)(ii)

- a. Customer and employees, representatives, agents, contractors and service providers of such customers;
- b. Suppliers, service providers to and vendors of JEHL and employees, representatives, agents, contractors and service providers of such suppliers and service providers;
- c. Directors and officers of JEHL;
- d. Shareholders;
- e. Job applicants;

- f. Existing and former employees (including contractors, agents, temporary and casual employees);
- g. Visitors to any premises of JEHL; and
- h. Complaints, correspondents and enquiries.

7.3. Nature of Personal Information

The nature of personal information processed in respect of the above data subjects may include, as may be applicable: Sec 51 (1)(c)(ii)

- a. Name, identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assignments to the person;
- b. Biometric information;
- c. Information relating to the education or the medical, financial, criminal or employment history of the data subject;
- d. Information relating to the race, gender, marital status, national origin, age disability, language and birth of the data subject;
- e. Confidential correspondence sent by the data subject;

7.4. Personal Information Recipients

JEHL may supply personal information to the following recipients: Sec 51 (1)(c)(iii)

- a. Regulatory, statutory and government bodies;
- b. Customers, suppliers, service providers, vendors, agents and representatives of JEHL;
- c. Employees of JEHL;
- d. Shareholders and other stakeholders;
- e. Third-party verification agencies and credit bureau;
- f. Collection agencies;
- g. Banks and other financial institutions.

7.5. Transborder Flow of Personal Information

Planned or prospective transborder flow of personal information processed by JEHL in respect of the above categories of data subjects: Sec 51 (1)(c)(iv)

Personal information of data subjects may be transferred across borders due to the hosting of some JEHL infrastructure and applications in foreign jurisdictions. Current employees and consultants' information may also be transferred transborder where JEHL has a physical presence or may be providing services or performing in terms of its contractual obligations.

7.6. Security Measures Implemented

Security measures implemented or to be implemented by JEHL to ensure the confidentiality, integrity and availability of the personal information which may be or is being processed by JEHL: Sec 51 (1)(c)(v)

JEHL continuously establishes and maintains appropriate, reasonable technical and organisational measures to ensure that the integrity of the personal information in its possession or under its control is secure and that such information is protected against unauthorised or unlawful processing, accidental loss, destruction or damage, alteration or access by having regard to the requirements set forth in the law, in industry practice and generally accepted information security practices and procedures which apply to JEHL.

8. Access Procedure and Requests

The purpose of this section is to provide requesters with sufficient guidelines and procedures to facilitate a request for access to a record held by JEHL.

It is important to note that an application for access to information can be refused in the event that the application does not comply with the procedural requirements of the Act. In addition, the successful completion and submission of an access request form do not automatically allow the requester access to the requested record. An application for access to a record is subject to certain limitations if the requested record falls within a certain category as specified within Part 3 Chapter 4 of the Act.

If it is reasonably suspected that the requester has obtained access to the JEHL's records through the submission of materially false or misleading information, legal proceedings may be instituted against such requester.

8.1. Guidance on Completion of Prescribed Access Form

To facilitate the processing of your request, kindly:

- a. Use the JEHL Data Subject Request Form (reference [1]) on the jasco.co.za website
- b. The JEHL Data Subject Request Form (reference [1]) must be completed in the English language
- c. Type or print in block letters.
- d. If a question is not applicable, answer as "N/A".
- e. Proof of identity is required to identify the requester.
- f. Provide sufficient details to enable efficient processing of your request.
- g. Provide sufficient records on the record requested.
- h. If the requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof.

8.2. Submission of Prescribed Access Form

The completed JEHL Data Subject Request Form (reference [1]) and its annexures, if applicable, must be submitted via registered mail, email or by hand and must be addressed to the Information Officer (details in section 3).

8.3. Payment of Prescribed Fees

Prescribed fees as published under Annexure A: Part 3 clause 8(1) and in Annexure B of the Regulations regarding the Promotion of Access to Information are as follows:

Item	Description	Amount
1	Copy of Guide per A4-size page	R3.90 per page
2	Photocopy of A4-size page	R3.90 per page or part thereof
3	A printed copy of A4-size page	R4.80 per page or part thereof
4	For a copy in a computer-readable form on: a) Flash drive b) Compact disc	a) R0 b) R56.00
5	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotations from the Service provider.
6	Copy of visual images	
7	Transcription of an audio record, per A4-size page	
8	Copy of an audio record	R56.00
9	Deposit: If search exceeds 6 hours	One-third of the amount per request, calculated in terms of items 2 to 8.
10	Postage	Actual expense

8.4. Notification

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

The thirty (30) day period within which JEHL has to decide whether to grant or refuse the request, may be extended for a further period of not more than thirty (30) days, if the request is for a large volume of information, or the request requires a search for information held at another office of JEHL and the information cannot be reasonably be obtained within the original thirty (30) day period. JEHL will notify the requester in writing should an extension be sought.

If the request for access to a record is successful the requester will be notified of the following:

- a. The amount of the access fee payable upon gaining access to the record;
- b. An indication of the form in which the access will be granted; and
- c. Notice that the requester may lodge an application with a court against the payment of the access fee and the procedure, including the period, for lodging the application.
- d. If the request for access to a record is not successful the requester will be notified of the following:
 - i. Adequate reasons for the refusal (refer to Third Party Information and Grounds for Refusal); and

- ii. That the requester may lodge an application with a court against the refusal of the request and the procedure, including the period, for lodging the application.

8.5. Records that cannot be found or do not exist

If JEHL has searched for a record and it is believed that the record either does not exist or cannot be found, the requester will be notified by way of an affidavit or affirmation. This will include the steps that were taken to try to locate the record.

9. Ground for Refusal of Access to Records and Appeal

9.1. Grounds for Refusal

The thirty (30) day period within which the Information Officer is required to reply to a request, as stipulated in the Act, shall commence only once a requester has complied with all the requirements of the Act in requesting access to a record, to the satisfaction of the Information Officer.

Requests may be refused on the following grounds, as set out in the Act:

- a. Mandatory protection of privacy of a third party who is a natural person, including a deceased person, which would involve the unreasonable disclosure of personal information of that natural person;
- b. Mandatory protection of commercial information of a third party or EOH, if the record contains:
- c. Trade secrets of the third party or EOH;
- d. Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of the third party or EOH; and
- e. Information disclosed in confidence by a third party to EOH if the disclosure could put that third party to a disadvantage or commercial competition.
- f. Mandatory protection of certain confidential information of a third party if disclosure of the record would result in a breach of a duty of confidence owed to that party in terms of an agreement;
- g. Mandatory protection of the safety of individuals, and the protection of property;
- h. Mandatory protection of records privileged from production in legal proceedings, unless the legal privilege has been waived; and
- i. Mandatory protection of research information of a third party and of JEHL.

9.2. Appeal

If a requester is aggrieved by the refusal of the Information Officer to grant a request for a record, the requester may, within thirty (30) days of notification of the Information Officer's decision, apply to the court for appropriate relief.

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