

1. Introduction

Spatial Technologies (Pty) Ltd (the “Company”) conducts business as a supplier of computer software, data and related services customers. This Promotion of Access to Information Manual (“Manual”) provides an outline of the type of records and the personal information it holds, and explains how to submit requests for access to these records in terms of the Promotion of Access to Information Act 2 of 2000 (“PAIA Act”). In addition, it explains how to access, or object to, personal information held by the Company, or request correction of the personal information, in terms of paragraphs 23 and 24 of the Protection of Personal Information Act 4 of 2013 (“POPI Act”).

The PAIA and POPI Acts give effect to everyone’s constitutional right of access to information held by private sector or public bodies, if the record or personal information 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. Requests shall be made in accordance with the prescribed procedures, at the rates provided. The forms and tariff are dealt with in section 5.

1.1 Availability of this PAIA Manual

A copy of this manual can be requested from the CEO (see contact details in section 2).

1.2 Availability of guides to the PAIA and POPI Acts

Guides to the PAIA and POPI Acts can be obtained and queries directed to:

- PAIA Act POPI Act, South African Human Rights Commission, Promotion of Access to Information Act Unit, Research and Documentation Department, Private Bag 2700, Houghton, Johannesburg, 2041.
- Information Regulator, PAIA Act
POPI Act Website : www.sahrc.org.za
- E-mail : PAIA@sahrc.org.za

2. Company contact details in terms of PAIA section 51:

Spatial Technologies (Pty) Ltd, a part of ST Group

Spaces Fourways, Design Quarter, Leslie Avenue East, Fourways, Johannesburg, South Africa.

P.O. Box: Spaces Centre, Design Quarter, Fourways, 2188, South Africa

Tel: +27 11 314 0788; Email: info@stgroup.co.za; Web: www.stgroup.co.za

Duly authorised persons:

CEO: Alan Ellis; alane@stgroup.co.za

Director: Andre Lombard; andrel@stgroup.co.za

Telephone number: +27 11 314 0788

3. Company records

3.1 Company records availability

Company records availability

Departmental records	Subject	Classification No.
Public communications	Current Product Information	1,4
	Public Corporate Records	1
	Launches and Events Records	4,5
	Media Releases	1
Health, Safety and Environmental	Environmental Policy	1
	Environmental Records	11,14
	Health and Safety Records	4,5,9
Human Resources	Employee Records	4,5,9
	Employment Contracts	4,5
	Personnel Policies and Procedures	12
	Employee Medical Records	4,5,8
	Employee Disability Insurance Records	4,5
	Employee Provident Fund Records	4,5
	Payroll Records	4,5
	Recruitment Records	4,5
Financial Department	Audited Financial Statements	12
	Tax Records (Company & Employees)	4,12
	Asset Register	12
	Supplier Records	4,5
	Management Accounts	4,5
	Insurance Records	4,5
Legal and Governance	General Contract Documentation	6,12
	Company Policies and Procedures	12
	Intellectual Property Records	3
	Employee, customer and supplier data	10
	Statutory Records	12
Sales and Marketing	Product Brochures	1
	Product Manuals	4,5
	Performance Records	12
	Product Sales Records	1
	Marketing and Future Product Strategies	12
	Customer Information and Database	4,5,12
	Partner Agreements and Documents	4,5,6,7,12,13
	Partner Records	4,5
Services	Service Records	12
	Software Engineering Records	12,13
	Fixes records	12
	Service desk records	4,5
Facilities Management	Physical Security Records	4,5
	Electronic Identity Management Records	4,5
	Time and Attendance Records	4,5

Company Record Classification Key

Classification No	Access	Classification [PAIA section]
1	May be Disclosed	Public Access Document
2	May not be Disclosed	Request after commencement of criminal or civil proceedings [s7]
3	May be Disclosed	Subject to copyright
4	Limited Disclosure	Personal Information of natural persons that belongs to the requester of that information, or personal information of juristic persons represented by the requestor of that information [s61]
5	May not be Disclosed	Unreasonable disclosure of personal information or of Natural person [s63(1)] or Juristic Person [POPI]
6	May not be Disclosed	Likely to harm the commercial or financial interests of third party [s64(a)(b)]
7	May not be Disclosed	Likely to harm the Company or third party in contract or other negotiations [s64(c)]
8	May not be Disclosed	Would breach a duty of confidence owed to a third party in terms of an Agreement [s65]
9	May not be Disclosed	Likely to compromise the safety of individuals or protection of property [s66]
10	May not be Disclosed	Legally privileged document [s67]
11	May not be Refused	Environmental testing / investigation which reveals public safety / environmental risks [s64(2); s68(2)]
12	May not be Disclosed	Commercial information of Private Body [s68]
13	May not be Disclosed	Likely to prejudice research and development information of the Company or a third party [s69]
14	May not be Refused	Disclosure in public interest [s70]

4. Processing of personal information

Spatial Technologies takes the privacy and protection of personal information very seriously and will only process personal information in accordance with the current South African privacy principles relating to the processing thereof. Accordingly, these privacy principles (including, but not limited to, the collection, handling, transfer, sharing, correction, storage, archiving and deletion) will be applied to any personal information processed by Spatial Technologies.

4.1 The purpose of processing of personal information by Spatial Technologies

We process personal information for a variety of purposes, including but not limited to the following:

- to provide or manage any information, products and/or services requested by data subjects;
- to help us identify data subjects when they contact Spatial Technologies;

- to maintain customer records;
- to maintain customer licence 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 Spatial Technologies' partnerships;
- to help us improve the quality of our products and services;
- to help us detect and prevent fraud and money laundering;
- 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.

4.2 Categories of data subjects and personal information processed by Spatial Technologies

Categories of data subjects and personal information processed by Spatial Technologies include the following:

Categories of Data Subjects	Personal Information processed
Customers and potential customers	Customer personal information Customer contracts and licences Customer product information Customer location information Customer service information Customer data about their customers
Business partners	Business partners Partner personal information Partner performance information
Suppliers	Supplier personal information Supplier intellectual property Supplier internal marketing programmes Supplier pricing policies
Employees	Employee medical information Employee Provident Fund Information Employee contracts Employee performance records Payroll records Health and safety records Training records Employment history Job applicants CV and application forms Background checks
Job applicants	Curriculum vitae and application forms Background checks

4.3 Recipients or categories of recipients with whom personal information is shared

We may share the personal information of our data subjects for any of the purposes outlined in Section 4.1, with: the following:

- our other ST Group Companies in South Africa and in other countries;
- our authorised Spatial Technologies partners;
- our carefully selected business partners who provide us with products and services; and
- 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.

We will send our data subjects notifications or communications if we are obliged by law, or in terms of our contractual relationship with them.

We will only disclose personal information to government authorities if we are required to do so by law.

Our employees, authorised ST Group partners and their employees, our principals and our suppliers, are required to adhere to data privacy and confidentiality principles.

4.4 Information security measures to protect personal information

Reasonable technical and organisational measures have been implemented for the protection of personal information processed by Spatial Technologies and its operators. In terms of the POPI Act, operators are third parties that process personal information on behalf of Spatial Technologies. 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 Spatial Technologies apply adequate safeguards as outlined above.

4.5 Trans-border flows of personal information

We will only transfer personal information across South African borders if the relevant business transactions or situation requires trans-border processing, and will do so only in accordance with South African legislative requirements; or if the data subject consents to transfer of their personal information to third parties in foreign countries. We will take steps to ensure that operators are bound by laws, binding corporate rules or binding agreements that provide an adequate level of protection and uphold principles for reasonable and lawful processing of personal information, in terms of the POPI Act. We will take steps to ensure that operators that process personal information in jurisdictions outside of South Africa, apply adequate safeguards as outlined in Section 4.4.

4.6 Personal information received from third parties

When we receive personal information from a third party on behalf of a data subject, we require confirmation that they have written consent from the data subject that they are aware of the contents of this PAIA manual and the Spatial Technologies Privacy Policy, and do not have any objection to our processing their information in accordance with this policy.

5. Prescribed request forms and fees

5.1 Form of request

To facilitate the processing of your request, kindly:

- i. Use the prescribed form on the Company website.
- ii. Address your request to the Legal Services and Compliance Department.
- iii. Provide sufficient detail to enable the Company to identify:
 - a) The record(s) requested.
 - b) The requestor (and, if an agent is lodging the request, proof of capacity).
 - c) The South African postal address, email address or fax number of the requestor.
 - d) The form of access required.
 - e) The South African postal address, email address or fax number of the requestor.
 - f) If the requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof.
 - g) The right which the requestor is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right.

5.2 Prescribed fees

The following applies to requests (other than personal requests):

- i. A requestor is required to pay the prescribed fees (R50.00) before a request will be processed.
- ii. If the preparation of the record requested requires more than the prescribed six hours, a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted).
- iii. A requestor may lodge an application with a court against the tender/payment of the request fee and/or deposit.
- iv. Records may be withheld until the fees have been paid.
- v. The detailed Fee Structure is available on the website of the Company, at the following address:
www.stgroup.co.za.

5.3 Access to prescribed forms and fees

Prescribed forms and fees are published on the Company website or, alternatively, copies can be requested from the Legal Services and Compliance Director (see contact details in section 2). Prescribed forms and fees can be found on the Company website as follows:

Forms: http://www.stgroup.co.za/legal/Prescribed_Form.doc

Fees: http://www.stgroup.co.za/legal/Prescribed_Fees.doc

6. Remedies

The company does not have internal appeal procedures regarding PAIA and POPI Act requests. As such, the decision made by the duly authorised persons in section 2, is final. If a request is denied, the requestor is entitled to apply to a court with appropriate jurisdiction, or the Information Regulator, for relief.

Appendix 1**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/Designated Person: _____

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: _____

C. Particulars of person on whose behalf request is made

This section must be completed ONLY if a request for information is made on behalf of another person.

Full names and surname: _____
 Identity number: _____

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: _____

Mark the appropriate space with an X.

NOTES:

- (a) Compliance with your request in the specified form may depend on the form in which the record is available.
- (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.
- (c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.

1. If the record is in written or printed form:
*copy of record** _____ *inspection of record* _____

2. If record consists of visual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.):
View the images _____ *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 _____ *Transcription of soundtrack** _____
(audio cassette) (written or printed document)

4. If record is held on computer or in an electronic or machine-readable form:
Printed copy of _____ *Printed copy of* _____ *Copy in computer* _____
Record *Information* *readable form** _____
*derived from the record** *(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