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t/a VWV Group (Pty) Ltd

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VWV Group

PAIA Manual

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3 List of Acronyms and Abbreviations

Abbreviation	Explanation
CEO	Chief Executive Officer
DIO	Deputy Information Officer
IO	Information Officer
Minister	Minister of Justice and Correctional Services
PAIA	Promotion of Access to Information Act No. 2 of 2000 (as amended)
POPIA	Protection of Personal Information Act No. 4 of 2013
Regulator	Information Regulator
Republic	Republic of South Africa



4 Purpose of the PAIA Manual

This PAIA Manual is prepared in accordance with section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA), as amended. The purpose of the manual is to assist members of the public in exercising their rights in terms of PAIA and POPIA.

Specifically, this Manual is useful for the public to:

- Check the categories of records held by VWV Group (Pty) Ltd which are available without a person having to submit a formal PAIA request.
- Have a sufficient understanding of how to make a request for access to a record of VWV, by providing a description of the subjects on which VWV holds records and the categories of records held on each subject.
- Know the description of records of VWV which are available in accordance with any other legislation.
- Access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access.
- Know the description of the guide on how to use PAIA, as updated by the Regulator, and how to obtain access to it.
- Know if VWV processes personal information, the purpose of such processing, and the description of the categories of data subjects and of the information or categories of information relating thereto.
- Know the recipients or categories of recipients to whom the personal information may be supplied.
- Know if VWV has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied.



- Know whether VWV has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

5 Key Contact Details

All requests for access to information and all enquiries relating to this Manual should be directed to the Information Officer or Deputy Information Officer of VWV Group.

5.1 Information Officer

Information Officer	
Name	Richard Lowe
Title / Position	Group Deputy Managing Director
Telephone	011 799 2745
Email Address	richard@vwv.com
Physical Address	59 Kyalami Blvd, Kyalami Park, Kyalami, 1684
Postal Address	59 Kyalami Blvd, Kyalami Park, Kyalami, 1684



5.2 Deputy Information Officer

In terms of section 56 of POPIA and section 17(1) of PAIA, a private body may designate one or more Deputy Information Officers to assist the Information Officer with access to information requests. The details of the Deputy Information Officer(s) of VWV are as follows:

Deputy Information Officer	
Name	William Takadi
Title / Position	Group Financial Director
Telephone	011 799 2600
Email Address	william@vww.com
Physical Address	59 Kyalami Blvd, Kyalami Park, Kyalami, 1684

5.3 General Access to Information Contact

General Contact Details	
General Email	info@vww.com
Website	www.vww.com

6 Guide on How to Use PAIA and How to Obtain Access to the Guide



The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("the Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

- The Guide is available in each of the official languages and in braille.
- The Guide contains the description of the objects of PAIA and POPIA.
- The Guide provides the postal and street address, phone number, and, if available, electronic mail address of the Information Officer of every public body and every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA.
- The Guide sets out the manner and form of a request for access to a record of a public body (section 11 of PAIA) and a private body (section 50 of PAIA).
- The Guide describes the assistance available from the Information Officer of a public body and from the Regulator, in terms of PAIA and POPIA.
- The Guide sets out all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging an internal appeal, a complaint to the Regulator, and an application to court.
- The Guide describes the provisions of sections 14 and 51, requiring a public and private body respectively to compile a manual, and how to obtain access thereto.
- The Guide describes the provisions of sections 15 and 52, providing for voluntary disclosure of categories of records.
- The Guide sets out the notices regarding fees to be paid in relation to requests for access, issued in terms of sections 22 and 54 of PAIA.
- The Guide describes the regulations made in terms of section 92 of PAIA.



Members of the public can inspect or make copies of the Guide from the offices of VWV and the Regulator, during normal working hours. The Guide can also be obtained upon request to the Information Officer, and from the website of the Regulator.

Information Regulator Website: www.inforegulator.org.za

7 Categories of Records Available Without Submitting a Formal Request

In terms of section 52 of PAIA, a private body may, on a voluntary basis, make available categories of records that are automatically available without a person having to submit a formal PAIA request. The following categories of records are available without a formal request:

Category of Records	Type of Record	Available on Website	Available on Request
PAIA Manual	This Manual	X	X
Privacy Notice	VWV Privacy Notice	X	X
General Company Information	Information about VWV's services and contact details	X	X
PAIA Form 2 (Request Form)	Form for submitting access to information requests	X	X



These records are available on the VWV website at www.vwv.com, or upon request to the Information Officer. No formal PAIA request is required to access the above categories of records.

8 Description of Records Available in Accordance with Other Legislation

All records created and maintained in accordance with applicable South African legislation are available subject to the provisions of that legislation. The following table identifies the categories of records held by VWV and the applicable legislation:

Category of Records	Applicable Legislation
Constitution	Constitution of the Republic of South Africa, 1996
Companies Act	Companies Act 71 of 2008
Consumer Protection Act	Consumer Protection Act 68 of 2008
Income Tax Act	Income Tax Act 58 of 1962
Value Added Tax Act	Value Added Tax Act 89 of 1991
POPIA	Protection of Personal Information Act 4 of 2013
PAIA	Promotion of Access to Information Act 2 of 2000
Basic Conditions of Employment Act	Basic Conditions of Employment Act 75 of 1997
Employment Equity Act	Employment Equity Act 55 of 1998



Category of Records	Applicable Legislation
Occupational Health and Safety Act	Occupational Health and Safety Act 85 of 1993
COIDA	Compensation for Occupational Injuries and Diseases Act 130 of 1993
Unemployment Insurance Act	Unemployment Insurance Act 30 of 1966
Copyright Act	Copyright Act 98 of 1978
ECTA	Electronic Communications and Transactions Act 25 of 2002
RICA	Regulation of Interception of Communications and Provision of Communication-Related Information Act 70 of 2002
Cybercrimes Act	Cybercrimes Act 19 of 2020
Customs and Excise Act	Customs and Excise Act 91 of 1964

9 Description of Subjects on Which VWV Holds Records and Categories of Records

The following table describes the subjects in respect of which VWV holds records, and the categories of records held on each subject. These records are available for the purposes of PAIA, subject to the grounds for refusal contemplated in Chapter 4 of PAIA.



Subject	Categories of Records
Human Resources	HR policies and procedures; employment contracts; payroll records; leave records; disciplinary records; training records; employee benefits; recruitment records; performance records.
Finance and Accounting	Annual financial statements; management accounts; tax returns and correspondence; VAT records; invoices; purchase orders; banking records; creditor and debtor records.
Client and Service Delivery	Client contracts and agreements; project records; correspondence; event and production records; service delivery documentation; invoices.
Supplier and Procurement	Supplier agreements and contracts; purchase orders; supplier correspondence; due diligence records; service level agreements.
Legal and Compliance	Company registration and statutory documents; board resolutions and minutes; PAIA and POPIA compliance records; regulatory correspondence; legal opinions.
Information Technology	IT policies; system and network configurations; software licences; security records; incident logs; backup and recovery records.
Marketing and Communications	Marketing materials and campaigns; media and advertising records; brand assets; website content; social media records.
Operations	Operational policies and procedures; health and safety records; facilities and asset management records; insurance records.



10 Processing of Personal Information

Note: The provisions of sections 10 of this Manual are included in compliance with the requirements of POPIA, which requires that the PAIA Manual disclose information about the processing of personal information by the responsible party.

10.1 Purpose of Processing Personal Information

VWV Group (Pty) Ltd processes personal information for the following purposes:

- Performing business operations, including the delivery of experiential, event, and related services to clients
- Managing and administering contractual relationships with clients and service providers
- Staff administration, including recruitment, human resources management, payroll, and employee wellness
- Keeping accounts, financial records, and statutory records in compliance with applicable legislation
- Complying with applicable tax, employment, and regulatory laws
- Marketing and communications, where lawfully permitted
- Managing information security and protecting the interests of VWV and its stakeholders



10.2 Categories of Data Subjects and Personal Information Processed

The following table describes the categories of data subjects in respect of whom VWV processes personal information, and the nature of the personal information processed:

Category of Data Subject	Personal Information Processed
Clients (Legal Entities)	Full names of contact persons; name and registration number of legal entity; physical and postal address; contact details; financial information; VAT number; tax-related information; correspondence.
Clients (Natural Persons)	Full names; contact details; physical and postal address; date of birth; identity number; tax-related information; nationality; gender; correspondence of a private or confidential nature.
Service Providers and Suppliers	Full name and registration number of entity; physical and postal address; contact details; financial information; VAT number; banking details; representative contact details.
Employees	Full names; identity number; contact details; physical and postal address; date of birth; nationality; gender; race; marital status; language; qualifications and education; employment history; financial information; tax information; medical information (where applicable and lawful); disciplinary records; opinions; criminal behaviour records



Category of Data Subject	Personal Information Processed
	(where applicable and lawful); biometric information (where applicable).
Job Applicants	Full names; contact details; identity number; qualifications; employment history; referee details; any information voluntarily provided as part of the application.
Website Visitors	IP address; browser type and version; pages visited; date and time of visit; referring website; cookie data.

10.3 Recipients or Categories of Recipients of Personal Information

VWV may supply personal information under its care to the following recipients or categories of recipients:

Category of Personal Information	Recipients or Categories of Recipients
Identity numbers and names	South African Police Service (SAPS) — for criminal record checks
Qualifications and academic records	South African Qualifications Authority (SAQA) — for qualification verifications
Credit and payment history	Credit bureaus — for credit checks
Tax information and financial records	South African Revenue Service (SARS) — for statutory tax compliance
Employment and remuneration records	Department of Labour — for statutory compliance



Category of Personal Information	Recipients or Categories of Recipients
Health and benefit information	Medical aid schemes and pension fund administrators — for employee benefits
All categories (data storage)	Cloud-based service providers, data storage and network providers — bound by data processing agreements
HR and payroll data	Human resources management system (HRMS) providers — bound by data processing agreements
Client and operational data	Third-party service providers engaged for joint commercial purposes — bound by data processing agreements

VWV ensures that all third-party recipients of personal information who act as operators on VWV's behalf are contractually bound to process personal information only in accordance with VWV's instructions and to implement adequate security measures.

10.4 Planned Transborder Flows of Personal Information

VWV makes use of certain cloud-based platforms and service providers whose servers may be located outside the Republic of South Africa. In such instances, personal information may be transferred to or processed in other jurisdictions. The following table provides an overview of the planned transborder flows of personal information:



Category of Information	Recipient Country / Region	Safeguards in Place
Cloud-based data storage and backup	Various (including servers located in the European Union, United Kingdom, or United States of America, depending on the service provider)	Where applicable, VWV ensures that adequate safeguards are in place through contractual data processing agreements with the relevant providers.
Cloud-based HR and operational platforms	Various	Contractual obligations imposed on service providers to ensure POPIA-equivalent protections.
Email and communication services	Various	Standard contractual measures and provider-level security controls.

VWV takes reasonable steps to ensure that all cross-border transfers of personal information are subject to adequate safeguards as required by section 72 of POPIA, including binding contractual agreements with the relevant service providers.



10.5 General Description of Information Security Measures

VWV Group (Pty) Ltd employs reasonable and appropriate technical and organisational security measures to ensure the confidentiality, integrity, and availability of personal information under its care. These measures include, but are not limited to:

- Boundary firewalls and internet gateways to protect against unauthorised external access
- Secure configuration of all hardware and software devices comprising the IT infrastructure
- Both logical and physical access controls, including role-based access permissions
- Malware protection, antivirus, and anti-spam solutions
- Regular patch management to keep all software current and secure
- Data encryption for sensitive information in transit and, where appropriate, at rest
- Regular staff training and awareness programmes on information security and POPIA compliance
- Incident response and breach notification procedures in compliance with POPIA

All service providers and operators who process personal information on behalf of VWV are required by contract to implement information security measures that are equivalent to, or more stringent than, those employed by VWV.

11 Availability of the Manual



A copy of this Manual is available:

- On the VWV website at www.vwv.com
- At the head office of VWV Group (Pty) Ltd, 59 Kyalami Blvd, Kyalami Park, Kyalami, 1684, for public inspection during normal business hours (Monday to Friday, 08:00 to 17:00)
- To any person upon request, and upon payment of a reasonable prescribed fee
- To the Information Regulator upon request

A fee for a copy of this Manual, as contemplated in Annexure B of the PAIA Regulations, shall be payable per each A4-size photocopy made. No fee is charged for access to the Manual via the VWV website.

12 Updating of the Manual

The Information Officer of VWV Group (Pty) Ltd will review and update this Manual on a regular basis, and whenever there are material changes to VWV's information holdings, organisational structure, or applicable legislation. The date of the most recent revision is indicated on the cover page of this Manual.

13 Procedure to Request Access to Records



Any person may submit a request for access to a record of VWV Group (Pty) Ltd in terms of section 50 of PAIA. The following procedure applies:

- Complete PAIA Form 2 ("Request for Access to Record of a Private Body"), which is available from the Information Regulator's website at: <https://inforegulator.org.za> (PAIA Form 2)
- Submit the completed form to the Information Officer of VWV Group, using the contact details set out in Section 3 of this Manual. The request may be submitted by email, post, or hand delivery.
- Pay the prescribed request fee (if any), as notified by the Information Officer in terms of section 54 of PAIA, before the request is processed further.
- VWV will acknowledge receipt of the request and will decide the request within 30 days of receipt, unless the period is extended in terms of section 57 of PAIA.
- If the request is granted, VWV will give access to the record in the manner and form requested, subject to payment of the prescribed access fee (if any).
- If the request is declined, VWV will provide reasons for the refusal, and inform the requester of any remedies available, including the right to lodge a complaint with the Information Regulator.

Requests may be refused on grounds set out in Chapter 4 of PAIA, including where access would unreasonably disclose personal information of a third party, endanger the safety of an individual, or prejudice commercial confidentiality.

14 Complaints to the Information Regulator



If a person believes that VWV has failed to comply with any provision of POPIA or PAIA, or that their rights as a data subject have not been respected, they may lodge a complaint with the Information Regulator. Contact details for the Regulator are as follows:

The Information Regulator (South Africa)	
Postal Address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Physical Address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
POPIA Complaints	POPIAComplaints@info regulator.org.za
PAIA Complaints	PAIAComplaints@info regulator.org.za
General Enquiries	info reg@justice.gov.za
Website	www.info regulator.org.za

