



KDBS Consulting

PROMOTION OF ACCESS TO INFORMATION MANUAL

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1. PURPOSE OF THIS MANUAL

The Promotion of Access to Information Act gives effect to the constitutional right of access to any information held by the public body or private body and that is required for the exercise or protection of any rights.

Section 51(1) of the Act requires heads of a private body to compile a manual that must contain information regarding the subjects and categories of records held by such private bodies. Hosmed meets the definition of a private body and has thus compiled a Manual in accordance with the said provisions and to fulfil the requirements of the Act.

In terms of the Act, where a request for information is made to a body, there is an obligation to provide the information, except where the Act expressly provides that the information may not be released. In this context, Section 9 of the Act recognizes that access to information can be limited. The limitation relates to circumstances where such release would pose a threat to the protection of privacy, commercial confidentiality, and the exercising of efficient governance.

This manual relates to the records held by KDBS from time to time and the process that needs to be adopted to access such records.

2. CONTACT DETAILS OF INFORMATION OFFICER FOR KDBS CONSULTING (PTY) LTD

All PAIA request must be addressed to the following details:

Information Officer:

Mr. Thobile Thomas
Chief Executive Officer
KDBS Consulting (Pty) Ltd

Physical Address:

Spaces Broadacres, Block A
Cnr. 3rd Avenue and Cedar Road
Willow Wood Office Park
Broadacres
2021

Contact Details

Email: info@kdbbs.co.za or thobile@kdbbs.co.za
Website: www.kdbselections.com

3. INFORMATION REGULATOR'S GUIDELINES

An official guide has been compiled which contains information to assist a person wishing to exercise a right of access to information in terms of PAIA and POPIA.

This Guide is made available by the Information Regulator (established in terms of POPIA). Copies of the updated Guide are available from the Information Regulator in the manner prescribed.

The Information Regulator (South Africa)

33 Hoofd Street Forum III, 3rd Floor Braampark
P.O Box 31533 Braamfontein Johannesburg 2017

Telephone Number: +27 (0) 10 023 5207

Fax Number: (011) 403-0668

Complaints email: complaints.IR@justice.gov.za

General enquiries email: inforeg@justice.gov.za

4. CLIENT RECORDS HELD BY KDBS CONSULTING (PTY) LTD

KDBS Consulting (Pty) Ltd holds the following records when executing electoral projects for Universities, Medical Aids, Pension Funds and other similar clients:

- Student Records (Name, Surname, ID Number, Student Number, Faculty, Academic Records, Email, Phone Number, Photographs, Resumes)
- Medical Aid Member Details (Name, Surname, ID Number, Membership Number, Email Address, Phone Number, Photographs, Resumes)
- Pension Fund Member Details (Name, Surname, ID Number, Membership Number, Email Address, Phone Number, Photographs, Resumes)
- Candidate Manifestos including manifesto video recordings
- Votes Cast
- Nominations Submitted
- Objections to nominated candidates and elected candidates or election results.
- Election Results.
- Seat Allocations based on election results.
- Recorded minutes of meetings

5. OTHER RECORDS HELD BY KDBS CONSULTING (PTY) LTD

- Human Resources records such as the following
 - a. Conditions of Service Employee Records
 - b. Employment Contracts
 - c. Employment Equity Records,
 - d. General Correspondence
 - e. Pension and Provident Fund Records
 - f. Policies and Procedures
 - g. Remuneration Records
 - h. Training Records
- Annual Financial Statements
- Communication material
- Asset Register

- Budgets
- Contracts
- Financial Transactions
- Insurance Information Management
- Purchase and Order Information
- Tax Records (employee)
- Information Technology Records
- any information held relevant to the business of KDBS Consulting (Pty) Ltd

6. PROCESS FOR REQUESTING INFORMATION OR ACCESS TO INFORMATION

- The requester must use the prescribed form to make the request for access to a record. A request form is available from our offices or at www.kdbselections.com.
- The request must be made to the Information Officer. This request must be made to the address or electronic mail address of the business.
- The requester must provide sufficient detail on the request form to enable the Information Officer to identify the record and the requester. The requestor should also indicate which form of access is required.
- The requestor should also indicate if any other manner should be used to inform the requester. If this is the case, please furnish the necessary particulars to be so informed.
- The requester must identify the right that is sought to be exercised or to be protected and must provide an explanation of why the requested record is required for the exercise or protection of that right. If a request is made on behalf of another person, the requester must submit proof of the capacity in which the requester is making the request to the satisfaction of the Information Officer
- The prescribed request fee must be attached. KDBS Consulting (Pty) Ltd will respond to your request within 30 days of receiving the request by indicating whether your request for access has been granted or denied. Kindly note that the successful completion and submission of a request for access form does not automatically allow the requestor access to the requested record.
- Access will be granted to a record only if the following criteria are fulfilled:
 - The record is required for the exercise or protection of any right; and
 - The requestor complies with the procedural requirements set out in the Act relating to a request, and Access to the record is not refused in terms of any ground for refusal as contemplated in Chapter 4 of Part 3 of the Act.

7. DENIAL OF ACCESS

Access to any record may be refused under certain limited circumstances. These include:

- The protection of personal information from unreasonable disclosure concerning any natural person;

- The protection of commercial information held concerning any third party (for example trade secrets);
- The protection of financial, commercial, scientific, or technical information that may harm the commercial or financial interests of any third party;
- Disclosures that would result in a breach of a duty of confidence owed to a third party;
- Disclosures that would jeopardize the safety or life of an individual; Disclosures that would prejudice or impair the security of property or means of transport;
- Disclosures that would prejudice or impair the protection of a person in accordance with a witness protection scheme;
- Disclosures that would prejudice or impair the protection of the safety of the public;
- Disclosures that are privileged from production in legal proceedings unless the privilege has been waived;
- Disclosures of details of any computer programme;
- Disclosures that will put KDBS Consulting (Pty) Ltd at a disadvantage in contractual or other negotiations or prejudice it in commercial competition;
- Disclosures of any record containing any trade secrets, financial, commercial, scientific, or technical information that would harm the commercial or financial interests of KDBS Consulting (Pty) Ltd
- Disclosures of any record containing information about research and development being carried out or about to be carried out by KDBS Consulting (Pty) Ltd
- If access to a record or any other relevant information is denied, the response will include: Adequate reasons for the refusal; and
- Notice that you may lodge an application with the court against the refusal and the procedure including details of the period for lodging the application.

8. THIRD-PARTY NOTIFICATION

KDBS Consulting (Pty) Ltd will take all reasonable steps to notify a third party if the record requested and disclosure thereof will be of a personal nature affecting the personal information of that third party.

9. INTERNAL REMEDIES

Where a request has been denied by KDBS Consulting (Pty) Ltd, the requester may lodge a complaint with the KDBS Consulting (Pty) Ltd Board of Directors and thereafter may lodge a complaint with the Information Regulator or approach the Court.

10. FEES

The applicable fees are prescribed in terms of the Regulations promulgated under the Act. There are two basic types of fees payable in terms of the Act.

- Request Fee - The non-refundable request fee of R 50 (excluding VAT) is payable on submission of any request for access to any record. This does

not apply if the request is for the personal records of the requestor. No fee is payable in such circumstances.

- Access Fee - The access fee is payable prior to being permitted access to the records in the required form. The applicable fees are prescribed in terms of Part III of Annexure A as identified in Government Notice Number 187, Regulation.

11. AVAILABILITY OF THE MANUAL

This Manual is available at the offices of KDBS Consulting (Pty) Ltd and on its website, www.kdbselections.co.za.

In respect of hard copies, any transmission costs or postage will be for the account of the requestor