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| Document Title | INFORMATION PAIA MANUAL | | |
| Document Number | AURAINFOSEC_2021_20 | Revision Number | 1 |
| Type of Document | MANUAL | Revision Date | 08/11/2021 |

INFORMATION PAIA MANUAL OF ZENDASCAPE (PTY) LTD ("PAIA MANUAL")

**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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Table of Contents

| | |
|--|----------|
| INTRODUCTION TO ZENDASCAPE (PTY) LTD | 3 |
| INFORMATION IN TERMS OF SECTION 51 | 3 |
| Contact details of the Chief Executive Officer [Section 51(1)(a)] | 3 |
| Contact details of the Information Officer [Section 51(1)(b)] | 3 |
| THE SECTION 10 GUIDE ON HOW TO USE THE ACT [SECTION 51(1)(B)] | 4 |
| 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)] | 4 |
| RECORDS AVAILABLE IN TERMS OF ANY OTHER LEGISLATION [SECTION 51(1)(B)(III)] | 4 |
| ACCESS TO THE RECORDS HELD BY THE PRIVATE BODY IN QUESTION [SECTIONS 51(1)(B)(III)] | 5 |
| Personnel Records | 5 |
| Customer Related Records | 5 |
| Private Body Records | 6 |
| Internal Correspondence Records | 6 |
| PROTECTION OF PERSONAL INFORMATION [SECTION 51(1)(C)] | 6 |
| Purpose of Processing | 6 |
| A description of the categories of data subjects and of the information or categories of information relating thereto | 6 |
| The recipients or categories of recipients to whom the personal information may be supplied | 7 |
| Planned transborder flows of personal information | 7 |
| The suitability of the information security measures to be implemented to ensure confidentiality, integrity and availability of the information which is to be processed | 7 |
| THE REQUEST PROCEDURES | 8 |
| Form of request: | 8 |
| FEES | 8 |
| AVAILABILITY OF THE MANUAL [SECTION 51(3)] | 9 |
| VALIDITY AND DOCUMENT MANAGEMENT | 9 |



| | | | |
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DOCUMENT VERSION AND CHANGE CONTROL

| VERSION | DATE | AUTHOR | COMMENT / SUMMARY OF UPDATES |
|---------|------------|------------------|------------------------------|
| 1.0 | 08/11/2021 | Grant MacWilliam | Initial Publication |

1. INTRODUCTION TO ZENDASCAPE (PTY) LTD

Zendascope (Pty) Ltd is a company duly registered in accordance with the laws of South Africa with company registration number 2017/217191/07. This PAIA Manual is relevant and has application for the major subsidiaries, portfolios, and subgroups of Zendascope (Pty) Ltd and is available to view at its premises located at 25 Commerce Crescent, Kramerville, Sandton, 2090 as well as on its website (<https://aura.services>).

2. INFORMATION IN TERMS OF SECTION 51

2.1. Contact details of the Chief Executive Officer [Section 51(1)(a)]

Chief Executive Officer: Warren Myers

Company Registration Number: 2017/217191/07

Registered Address: 25 Commerce Crescent, Kramerville, Sandton, 2090

Postal Address: 25 Commerce Crescent, Kramerville, Sandton, 2090

Phone Number: 011 568 5090

Website: <https://aura.services>

2.2. Contact details of the Information Officer [Section 51(1)(b)]

Information Officer: Grant MacWilliam

Physical Address: 25 Commerce Crescent, Kramerville, Sandton, 2090

Phone Number: 011 568 5090

Email Address: grantm@aura.services

Alternate Email Address: infosec@aura.services



| | | | |
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3. THE SECTION 10 GUIDE ON HOW TO USE THE ACT [SECTION 51(1)(B)]

- 3.1. 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.
- 3.2. 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.
- 3.3. 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

4. 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 published on the categories of records that are automatically available without a person having to request access in terms of the Act.

5. 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



| | | | |
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- Electronic Communications and Transactions Act No 25 of 2002
- Employment Equity Act No 55 of 1998
- 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

6. 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)]:

6.1. Personnel Records

“Personnel” refers to any person who works for, or provides services to or on behalf of Zendascape (Pty) Ltd and receives or is entitled to receive remuneration from Zendascape (Pty) Ltd.

- 6.1.1. Personal Records provided by personnel.
- 6.1.2. Records provided by a third party relating to personnel.
- 6.1.3. Conditions of employment as well as other personnel related contractual records.
- 6.1.4. Correspondence relating to personnel.

6.2. Customer Related Records

A “customer” refers to any individual or entity that receives services from Zendascape (Pty) Ltd.

- 6.2.1. Records provided by a customer to Zendascape (Pty) Ltd.
- 6.2.2. Records provided by a third party relating to Zendascape (Pty) Ltd’s customers.



| | | | |
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6.2.3. Records generated by or within Zendascope (Pty) Ltd relating to its customers.

6.3. Private Body Records

6.3.1. Information Technology and associated records.

6.3.2. Databases and data housing structures.

6.3.3. Marketing records.

6.3.4. Operational records.

6.3.5. Financial records.

6.4. Internal Correspondence Records

These records include but are not limited to, any records which pertain to Zendascope (Pty) Ltd's own affairs.

6.4.1. Internal Policies and Procedures.

6.4.2. Records held by officials of the institution.

6.4.3. Product records.

6.4.4. Statutory records.

7. PROTECTION OF PERSONAL INFORMATION [SECTION 51(1)(C)]

7.1. Purpose of Processing

Zendascope (Pty) Ltd collects and uses personal information to:

- Provide emergency security and medical services to an individual or business.

7.2. 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 Zendascope (Pty) Ltd include the following:

| Categories of Data Subjects | Personal Information processed |
|------------------------------------|---|
| Employees | Name, surname, gender, id number, physical address, nationality, contact number, age, information relating to the criminal and employment history of an employee. |



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| | |
|-----------|--|
| Suppliers | Name, surname, email address, contact number. |
| Customers | Name, surname, email address, gender, date of birth, age, particulars relating to medical aid and medical conditions, associations to dependent individuals. |

7.3. The recipients or categories of recipients to whom the personal information may be supplied

Zendascope (Pty) Ltd may share the information we collect with:

- Relevant law enforcement.
- Third party medical and security providers.

7.4. Planned transborder flows of personal information

Zendascope (Pty) Ltd primarily stores personal information in Ireland using AWS cloud services and infrastructure. All personal information and records used for services rendered will be transferred cross border to Ireland.

Zendascope (Pty) Ltd runs a 24/7 emergency control room located in Kramerville, South Africa. This means that in the context of an emergency request, personal information will flow to South Africa for the duration of the emergency.

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

Zendascope (Pty) Ltd implements and maintains reasonable technical and organisational measures to ensure the protection of personal information. This includes but is not limited to the implementation of policies, procedures, and controls aimed at preventing any unauthorised access to and/or loss or destruction of personal information.

Zendascope (Pty) Ltd has and will continue to take all necessary measures to ensure that third party providers who process personal information on behalf of Zendascope (Pty) Ltd apply the appropriate safeguards in compliance with the POPIA.



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8. THE REQUEST PROCEDURES

8.1. Form of request:

- 8.1.1. The requester must use the prescribed form (available on the website of the South African Human Rights Commission at www.sahrc.org.za) to make the request for access to a record. This must be made to the Information officer. This request must be made to the address or electronic mail address of the body concerned [s 53(1)].
- 8.1.2. 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)].
- 8.1.3. 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)].
- 8.1.4. 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)].

9. FEES

- 9.1. 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:
- 9.2. 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)].
- 9.3. The requester may lodge an application to the court against the tender or payment of the request fee [s 54(3)(b)].



| | | | |
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- 9.4. After the Information Officer has made a decision on the request, the requester must be notified in the required form.
- 9.5. 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)].
- 9.6. Records may be withheld until the fees have been paid.
- 9.7. The fee structure is available on the website of the South African Human Rights Commission at www.sahrc.org.za. www.sahrc.org.za.

10. AVAILABILITY OF THE MANUAL [SECTION 51(3)]

- 10.1. This manual is available from the South African Human Rights Commission www.sahrc.org.za.
- 10.2. Zendascape (Pty) Ltd will update this PAIA Manual at such intervals as may be deemed necessary.

11. VALIDITY AND DOCUMENT MANAGEMENT

This document is valid as of 08/11/2021.
Owner of this document is the Information Officer

Information Officer
Grant MacWilliam


