



POPIA & PAIA MANUAL

Prepared in terms of section 51 of the
Promotion of Access to Information Act
2 of 2000 (as amended)

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1. LIST OF ACRONYMS AND ABBREVIATIONS

2. PURPOSE OF PAIA MANUAL

- 2.1. check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2. have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3. know the description of the records of the body which are available in accordance with any other legislation;
- 2.4. 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;
- 2.5. know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6. know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;

- 2.7. know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8. know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9. know if the body 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; and
- 2.10. know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF CIVIL CUTTING & DRILLING OPERATIONS (PTY) LTD

3.1. Chief Information Officer

Name: Leon Van Der Nest
Tel: 082 214 5395
Email: leon@ccdo.co.za

3.2. Access to information general contacts

Email: info@ccdo.co.za

3.4 Head Office

Physical Address: 118 Horak Street, Kraaifontein, 7570
Telephone: 082 214 5395

Email: info@ccdo.co.za

Website: www.ccdo.co.za

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

- 4.1. 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 (“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.
- 4.2. The Guide is available in each of the official languages and in braille.
- 4.3. The aforesaid Guide contains the description of-
 - 4.3.1 the objects of PAIA and POPIA;
 - 4.3.2 the postal and street address, phone and fax number and, if available, electronic mail address of-
 - 4.3.2.1 the Information Officer of every public body, and
 - 4.3.2.2 every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
 - 4.3.3 the manner and form of a request for-
 - 4.3.3.1 access to a record of a public body contemplated in section 11³; and
 - 4.3.3.2 access to a record of a private body contemplated in section 50⁴;
 - 4.3.4 the assistance available from the IO of a public body in terms of PAIA and POPIA;
 - 4.3.5 the assistance available from the Regulator in terms of PAIA and POPIA;
 - 4.3.6 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-
 - 4.3.6.1 an internal appeal;
 - 4.3.6.2 a complaint to the Regulator; and
 - 4.3.6.3 an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
 - 4.3.7 the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
 - 4.3.8 the provisions of sections 157 and 528 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
 - 4.3.9 the notices issued in terms of sections 229 and 5410 regarding fees to be paid in relation to requests for access; and
 - 4.3.10 the regulations made in terms of section 9211

¹ Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

² Section 56(a) of POPIA- *Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information*

officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.

- 3 Section 11(1) of PAIA- A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*
 - 4 Section 50(1) of PAIA- A requester must be given access to any record of a private body if-*
 - a) that record is required for the exercise or protection of any rights;*
 - b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and*
 - c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*
 - 5 Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.*
 - 6 Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.*
 - 7 Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access*
 - 8 Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access*
 - 9 Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.*
 - 10 Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.*
 - 11 Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-*
 - (a) any matter which is required or permitted by this Act to be prescribed;*
 - (b) any matter relating to the fees contemplated in sections 22 and 54;*
 - (c) any notice required by this Act;*
 - (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and*
 - (e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”*
- 4.4 Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.
- 4.5 The Guide can also be obtained-

- 4.5.1 upon request to the Information Officer
- 4.5.2 from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).
- 4.5.3 A copy of the Guide is also available in the following in English, for public inspection during normal office hours-

5. DESCRIPTION OF RECORDS OF CCDO WHICH ARE ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
Memorandum of incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
POPI Manual	Protection Of Personal Information Act, 4 of 2013
Workman’s Compensation Fund: Letter of Good Standing	Compensation For Occupational Injuries And Diseases Act, 130 Of 1993
Health and Safety Plan	Occupational Health And Safety Act 85 of 1993

6. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY THE CCDO

Subjects on which the body holds records	Categories of records
Strategic Documents, Plans, Proposals	Annual Reports, Strategic Annual Plan, Performance Plan.

Human Resources	<ul style="list-style-type: none"> - HR policies and procedures - Advertised posts - Employees records
Agreements	<ul style="list-style-type: none"> - Supplier Agreements - Contracts and agreements with clients
Statutory and Legal	<ul style="list-style-type: none"> - Health and Safety files - LOGS from the CF - Other compliance documents

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

The Company collects and uses Personal Information from individuals and corporate entities to efficiently operate and conduct its business. This includes, but is not limited to, Personal Information of employees, contractors, vendors, suppliers, and service providers.

For more details on how the Company processes Personal Information, the purposes for which it is used, the categories of third parties with whom Personal Information may be shared, and any planned trans-border flows of Personal Information, please refer to the Privacy Notice on the CCDO website.

The Company's Privacy Notice is available at www.ccdco.co.za and is incorporated by reference herein. A copy of the Privacy Notice can also be requested from the Information Officer using the contact details provided in this PAIA Manual.

8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

The Company may use or process any goods, services information, or optional information you provide for the purposes you specified when you consented to share it. This processing involves collecting Personal Information, disclosing it, and combining it with other Personal Information.

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	name, address, registration numbers or identity numbers, employment status and bank details
Service Providers/ vendors or contractors	Company name, representative name(s) and contact information, registration number, VAT number, address, trade secrets and bank details
Employees	address, qualifications, gender and race
Community Stakeholders	Name, address, registration numbers or identity numbers, contact numbers

8.3 Planned transborder flows of personal information

We may use cloud based solutions for processing our information, this may include United States and United Kingdom data centres for our accounting, invoicing and CRM systems, such as Zoho or such others as may be the case from time to time.

8.4 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

The Company has implemented good governance processes and procedures including implementing an Information Security Management System aligned to ISO/IEC 27001 and its related ISO/IEC 27002 guidelines.

Such measures include, but is not limited to:

- *Information Security policies; Incident Management policies and procedures;*
- *Access and Network access controls; Data Breach reporting and notification procedures;*
- *Management of Privileged Access controls; Backup and Disaster Recovery plans;*
- *Encryption controls; Change control procedures; as well as*
- *Information identification and classification controls; Numerous other information and cyber-security measures.*
- *Mobile device and remote access controls;*

The Company has also implemented robust data privacy procedures including, but not limited to, handling of Data Subject

requests, complaints, data breaches and related notifications, managing Operator security and agreements, and

transborder information flow, among others.

The Company continuously implements and monitors technical and organisational security measures to protect the

Personal Information it holds against unauthorised access, as well as accidental or wilful manipulation, loss or destruction

9. Request to Access Procedure

9.1 Protection of Information

The Company prioritizes protecting the private and/or confidential information of its Data Subjects. Please ensure any request for Personal Information is thoroughly justified, considering the POPI Act and the rights the requester may rely on. Requests are not automatically granted, and brief reasons for any refusal will be provided.

9.2 Definition of Requestor

Any individual making a request for access to the Company's records is referred to as a "requestor".

9.3 Access to Forms

The requestor can obtain the latest PAIA and POPIA forms from the Information Regulator's website: Information Regulator, use the "Annexure of Forms" with hyperlinks at the end of this Manual, or request a copy from the Company's Information Officer.

9.4 Application Submission

The requestor must complete the prescribed application form "PAIA Form 2" and submit it, along with the request fee and a deposit if applicable, to the Information Officer at the postal, physical, or electronic mail address provided in section 4 of this Manual.

The form must include sufficient particulars to enable the Information Officer to:

- Identify the record or records requested.
- Verify the identity of the requestor.
- Determine the form of access required, if granted.
- Obtain the requestor's postal address, telephone number, and fax number.

9.5 Justification of Request

The requestor must state that the information is required to exercise or protect their right, clearly explaining the nature of the right and why the records are necessary for this purpose.

9.6 Processing Timeline

Requests must be processed within 30 days of receipt.

9.7 Notification of Outcome

The requestor will be informed whether access has been granted or denied within 30 days, along with the reasons for the decision. The outcome will be provided using "PAIA Form 3" by the Information Officer.

9.8 Extension of Processing Time

The 30-day period may be extended by an additional 30 days if the request involves a large volume of information or cannot reasonably be processed within the original period. The requestor will be notified in writing of any extension.

9.9 Granting Access

If access is granted, the Information Officer will inform the requestor of:

- The access fee (if any) to be paid.
- The form in which access will be provided.
- The requestor's right to lodge a court application against the access fee or form of access granted, and the procedure for doing so.

9.10 Refusal of Access

If access is refused, the Information Officer will:

- Provide adequate reasons for the refusal, including the relevant provisions of the Act.
- Exclude any reference to the content of the record.
- Inform the requestor of their right to lodge a court application against the refusal, and the procedure for doing so.

9.11 Notification of Record Unavailability

If all reasonable steps have been taken to locate the requested record and it is believed to be in the Company's possession but cannot be found, the Information Officer will notify the requestor by affidavit or affirmation that access is not possible.

9.12 Access After Record Discovery

If the record is found after the notification, access must be granted unless grounds for refusal exist.

9.13 Notice of Declined Request

If a request is declined, the notice must include adequate reasons for the decision, relevant provisions of the PAIA Act relied upon, and the procedure for appealing the decision.

9.14 Partial Access

In terms of Section 59 of the PAIA Act, the Information Officer may grant access to only those portions of the record to which access is not prohibited.

9.15 Fee Payment

The requestor must pay the prescribed fee before any further processing can take place.

10. FEES

10.1 Types of Fees

The Act stipulates two types of fees:

- a) Request Fee: A standard fee.
- b) Access Fee: Calculated based on reproduction costs, search and preparation time, and postal costs.

10.2 Payment of Request Fee

Upon receiving a request, the Information Officer will notify the requestor to pay the prescribed request fee ("PAIA Form 3") before further processing.

10.3 Personal Information Access

If a requestor seeks access to their own Personal Information, no request fee is payable. However, prescribed access and reproduction fees must be paid.

10.4 Deposit for Extensive Searches

If the search and preparation of records exceed the hours prescribed by regulations, the Information Officer will notify the requestor to pay a deposit, which is a portion of the access fee.

10.5 Withholding Records

Records will be withheld until the requestor has paid the fees as indicated in "PAIA Form 3." Refer to "Annexure A" of this Manual for the current Prescribed Fee structure.

10.6 Access Fee Payment

Requestors whose access requests are granted must pay an access fee for reproduction, search, and preparation time exceeding the prescribed hours.

10.7 Refund of Deposit

If access is refused after a deposit has been paid, the Information Officer must refund the deposit with interest at the prescribed rate. Refer to "Annexure B" of this Manual for the current fee structure.

10.8 Other Fees

The following requests are exempt from fees:

- a) Objection to the Processing of Personal Information.
- b) Request for Correction or Deletion of Personal Information or Destruction of Record of Personal Information.

- c) Complaint Regarding Interference with the Protection of Personal Information.

11. Grounds for refusal to access of records

The Company reserves the right to refuse access to information on legal grounds as outlined in the POPI Act and PAIA Act, Chapter 4, Sections 62 to 70. The outcome will be recorded on "PAIA Form 3."

12. Remedies [Section 57(1)]

The Company does not have an internal appeal procedure. Therefore, decisions made by the Information Officer or Deputy Information Officer are final. Requestors must seek external remedies if dissatisfied with the response.

13. Complaints

We encourage that any complaints regarding a PAIA or POPIA request be first addressed to the Company's Information Officer using the contact details provided in section 4 of this Manual.

However, requestors have the right to lodge complaints:

- PAIA Complaints: Section 77 complaints may be lodged in writing to the Information Regulator using "PAIA Form 5."
- POPIA Complaints: Section 74 complaints may be lodged in writing to the Information Regulator using "POPIA Form 5."
- The Information Regulator's contact information is provided in section 5 of this Manual.

14. Quick Links

14.1 POPIA Forms

- [FORM 1 - Objection To The Processing Of Personal Information](#)
- [FORM 2 - Request For Correction Or Deletion Of Personal Information](#)
- [FORM 3 - Application For The Issue Of A Code Of Conduct](#)
- [FORM 4 - Application For The Consent Of A Data Subject For The Processing Of Personal Information For The Purpose Of Direct Marketing](#)
- [FORM 5 - Complaint Regarding Interference With The Protection Of](#)
- [POPIA Forms Page](#)

14.2 PAIA Forms

- [FORM 1: Request for a Guide from the Regulator](#)
- [FORM 2 - Request for Access to Record](#)
- [FORM 3 - Outcome of request and of fees payable](#)
- [FORM 4 - Internal Appeal Form](#)
- [FORM 5 - Complaint Form](#)

15. AVAILABILITY OF THE MANUAL

15.1. A copy of the Manual is available-

- on www.ccdo.co.za
- head office of the CCDO for public inspection during normal business hours;
- to any person upon request and upon the payment of a reasonable prescribed fee; and
- to the Information Regulator upon request.

15.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

16. UPDATING OF THE MANUAL

The head of CCDO will on a regular basis update this manual.

Issued by

L VAN DER NEST

DIRECTOR