

SMART LINE INTEGRATION (PTY) LTD

[Registration Number 2005/015206/07]

PROMOTION OF ACCESS TO INFORMATION ACT MANUAL - IN TERMS OF SECTION 51 OF THE ACT

(ACT No. 2 OF 2000)
("the Act")

**A copy of the Manual will be available for inspection at the office of
SMART LINE INTEGRATION (PTY) LTD**

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INTRODUCTION

SMART LINE INTEGRATION (PTY) LTD was formed in 2005. The Company's main business is that of design, installation and maintenance of security systems.

The Company holds a substantial amount of information that it gathers during the course of its business operations. This information is of interest to the people it affects directly, whether they are clients, suppliers, business partners, or employees. It is also of interest to competitors, litigants, and the curious. The Promotion of Access to Information Act, 2000, ("the Act") reinforces the confidentiality of this information by providing that it must not be disclosed in terms of the Act, except to the person to whom it relates or that person's authorised representative. In addition, the Act provides for confidentiality of various aspects of the Company's business operations, where this would be appropriate.

If you wish to make a request for access to the Company's records in terms of the Act, you should complete the request form in **Annexure 1** and address it to the Information Officer. Access to records will be granted in the format requested or in the format that the records exist if the requested format is not available.

This is the first edition of SMART LINE INTEGRATION (PTY) LTD's Manual in terms of the Act. It will change and develop as the Company and requesters explore the practical implementation of the Act, the balance the Act seeks to strike between the right to information and other rights, such as that of privacy.

PARTICULARS IN TERMS OF SECTION 51 OF THE ACT

The reference, in this Manual, to any information in addition to that specifically required in terms of Section 51 of the Act does not create any right or entitlement (contractual or otherwise) to receive such information, other than in terms of the Act.

1. Contact Details [Section 51(1)(a)]

Name of Private Body :	Smart Line Integration (Pty) Ltd
Trading name of Private Body :	Smart Line Integration (Pty) Ltd
Designated Information Officer :	Glenamia G Deyzel
E-Mail address of Information Officer :	penny@sligroup.co.za
Postal address :	PO Box 4337, Edenvale, 1610
Street address :	1 st Floor Helvetia House, Greenvale Road, Wilbart, Germiston, 1401
Telephone number :	+27 11 450 1939
Facsimile number :	+27 11 450 4895

2. The Section 10 Guide on how to use the Act [Section 51(1)(b)]

The guide on how to exercise your rights in terms of the Act will be available by not later than August 2003 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
Private Bag 2700
Houghton
2041

Telephone : +27 11 484 8300
Facsimile : +27 11 484 0582
Web site : www.sahrc.org.za
E-mail : paia@sahrc.org.za

3. Records available in terms of any other Legislation [Section 51(1)(d)]

Information is available in terms of the following legislation to the persons or entities specified in such legislation :

Basic Conditions of Employment No. 75 of 1997
Companies Act No. 61 of 1973
Compensation for Occupational Injuries and Health Diseases Act No.130 of 1993
Employment Equity Act No. 55 of 1998
Income Tax Act No. 95 of 1967
Labour Relations Act No. 66 of 1995
Occupational Health & Safety Act No. 85 of 1993
Pension Funds Act No. 24 of 1956
Regional Services Councils Act No. 109 of 1985
Skills Development Act No. 97 of 1998
Skills Development Levies Act No. 9 of 1999
Stamp Duties Act No. 77 of 1968
Unemployment Contributions Act No. 4 of 2002
Unemployment Insurance Act No. 63 of 2001
Value Added Tax Act No. 89 of 1991

4. Access to records held [Sections 51(1)(c) and 51(1)(e)]

i. Categories of the Company's records which are available without a person having to request access in terms of Section 52(2) of the Act, i.e. voluntary disclosure. [Section 51(1)(c)]

SMART LINE INTEGRATION (PTY) LTD is not obliged to publish a notice in terms of Section 52(2) of the Act and to date has not elected to do so. Nevertheless the Company does make certain information freely available to the public in various brochures, press releases, and publications. Certain information is also made available to employees of the Company, which is not generally made available to the public. To avoid confusion, these items are not listed here but may be obtained by the Company's employees from the designated Information Officer.

ii. Records that may be requested [Section 51(1)(e)]

The Company maintains records on the following categories and subject matters. **However, please note that recording a category or subject matter in this Manual does not imply that a request for access to such records would be honoured.** All requests for access will be evaluated on a case by case basis in accordance with the provisions of the Act. In particular, there may be applicable grounds of refusal of such a request, as set out in the Act.

a. Internal records

The following are records pertaining to the Company's own affairs :

- Memorandum and Articles of Association,
- Financial records,
- Intellectual property,
- Internal correspondence,
- Internal policies and procedures,
- Marketing records,
- Minutes of meetings,
- Operational records,
- Records held by officials of SMART LINE INTEGRATION (PTY) LTD,
- Service records,
- Statutory records, and
- Charters, codes of conduct and policies (both internal and external) to which the Company and its personnel subscribe.

b. Personnel records

For the purposes of this section, "personnel" means any person who works for or provides services to or on behalf of the Company and receives or is entitled to receive any remuneration and any other person who assists in carrying out or conducting the business of the Company. This includes, without limitation, Directors, all permanent, temporary and part time staff as well as consultants and contract workers.

Personnel records include the following :

- Any personal records provided to us by our personnel,
- Any records a third party has provided to us about any of their personnel,
- Conditions of employment and other personnel related contractual and quasi-legal records,
- Remuneration records and policies,
- Employment policies and procedures,
- Internal evaluation and disciplinary records, and
- Other internal records and correspondence.

c. Client related records

Client related information includes the following :

- Contracts with the client and between the client and other persons,
- Any records a client has provided to the Company or a third party acting for or on behalf of the Company (including financial, legal, tax, operational, employee and similar records),
- Working papers and notes,
- Any research conducted by SMART LINE INTEGRATION (PTY) LTD in respect of its clients or research derived by the Company from its clients and their activities,
- Records, reports, designs and the like generated by the Company or its clients,

- Any records a third party has provided to the Company, which concerns a client, and
- Records generated by or within the Company pertaining to the client, including transactional records.

d. Other parties

Records are kept in respect of other parties, including without limitation **joint ventures and consortia** to which the Company is a party, contractors and sub-contractors, suppliers, service providers, and providers of information regarding general market conditions. In addition, such other parties may possess records which can be said to belong to the Company.

The following records fall into this category :

- Personnel, client, or the Company's records which are held by another party as opposed to being held by the Company, and
- Records held by the Company pertaining to other parties, including financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors or suppliers.

e. Other records

We hold further records, including :

- Information relating to SMART LINE INTEGRATION (PTY) LTD's own commercial activities,
- Procurement and administration for the Company, and
- Research information belonging to the Company or carried out on behalf of a third party.

iii. The request procedures

a. Form of request

- Requests for access to records held by SMART LINE INTEGRATION (PTY) LTD must be made on the prescribed forms that are available from the SAHRC website (www.sahrc.org.za) or the Department of Justice and Constitutional Development website (www.doj.gov.za) (under "regulations"). If a requestor does not use the standard form, the request may be rejected for lack of procedural compliance, refused (if sufficient information is not provided, or otherwise) or delayed. Requests for access to records must be made to the Information Officer ("the head") at the address, facsimile number or electronic mail address provided [Section 53(1)].
- 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 [Sections 53(2)(a) and (b) and (c)].
- 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 [Section 53(2)(d)].
- 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 [Section 53(2)(f)].
- Kindly note that all requests to SMART LINE INTEGRATION (PTY) LTD will be evaluated and considered in accordance with the Act. Publication of this Manual and describing the categories and subject matter of information held by the Company does not give rise to any rights to access such information or records, except in terms of the Act.

b. Fees

Please note that requestors are required to pay the prescribed fees. The list of prescribed fees in respect of requests, and in respect of access to records (if the request is granted) is attached as Annexure 2. 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 :

- 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 [Section 54(1)].
- The fee that the requester must pay to a private body is R50. The requester may lodge an internal appeal or an application to the court against the tender or payment of the request fee [Section 54(3)(b)].
- After the Information Officer has made a decision on the request, the requester must be notified in the required form.
- 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 to search and prepare the record for disclosure [Section 54(6)].

5. Other information as may be prescribed [Section 51(1)(f)]

The Minister of Justice and Constitutional Development has not made any regulations in this regard.

6. Availability of the Manual [Section 51(3)]

The Manual is available from the South African Human Rights Commission (see contact details above), and from **SMART LINE INTEGRATION (PTY) LTD** (see details above).

7. Useful references

<i>The Act</i>	http://www.gov.za/gazette/acts/2000/a2-00.pdf
<i>The Act's Regulations</i>	http://www.doj.gov.za/reg/reg187.pdf

Certified correct,



Glenamia G Deyzel
[Information Officer]

8 December 2011

Prescribed forms

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:

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:
<p><i>Mark the appropriate box with an X.</i></p> <p>NOTES:</p> <p><i>a) Compliance with your request in the specified form may depend on the form in which the record is available.</i></p> <p><i>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.</i></p> <p><i>c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.</i></p>	

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 (audio cassette)		transcription of soundtrack* (written or printed document)
4. If record is held on computer or in an electronic or machine-readable form:			
	printed copy of record*		printed copy of information derived from the record* copy in computer readable form* (stiffy or 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

Fees in respect of private bodies

1. The fee for a copy of the manual as contemplated in regulation 9(2)(c) is R1, 10 for every photocopy of an A4-size page or part thereof.
2. The fees for reproduction referred to in regulation 11(1) are as follows:

	R
(a) For every photocopy of an A4-size page or part thereof	1,10
(b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	0,75
(c) For a copy in a computer-readable form on -	
(i) stiffy disc	7,50
(ii) compact disc	70,00
(d) (i) For a transcription of visual images, for an A4-size page or part thereof	40,00
(ii) For a copy of visual images	60,00
(e) (i) For a transcription of an audio record, for an A4-size page or part thereof	20,00
(ii) For a copy of an audio record	30,00
3. The request fee payable by a requester, other than a personal requester, referred to in regulation 11(2) is R50,00.
4. The access fees payable by a requester referred to in regulation 11(3) are as follows:

	R
(1)(a) For every photocopy of an A4-size page or part thereof	1,10
(b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	0,75
(c) For a copy in a computer-readable form on -	
(i) stiffy disc	7,50
(ii) compact disc	70,00
(d) (i) For a transcription of visual images, for an A4-size page or part thereof	40,00
(ii) For a copy of visual images	60,00
(e) (i) For a transcription of an audio record, for an A4-size page or part thereof	20,00
(ii) For a copy of an audio record	30,00
(f) To search for and prepare the record for disclosure, R30,00 for each hour or part of an hour reasonably required for such search and preparation.	
(2) For purposes of section 54(2) of the Act, the following applies:	
(a) Six hours as the hours to be exceeded before a deposit is payable; and	
(b) one third of the access fee is payable as a deposit by the requester.	
(3) The actual postage is payable when a copy of a record must be posted to a requester.	