



# INFORMATION MANUAL

Prepared in accordance with Section 51 of the Promotion of Access to Information Act, No. 2 of 2000

This document serves as the information manual as required by Section 51(1) of the Promotion of Access to Information Act, No.2 of 2000 (the "Act") for a private body. It provides information on the records held and the process that is to be followed to request access to such records.

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## 1 PURPOSE AND AVAILABILITY

- 1.1 The Promotion of Access to Information Act, 2000, gives effect to section 32 of the Constitution, which provides that everyone has the right to access information held by the State or any other person (or private body), when that information is required for the exercise or protection of any rights.
- 1.2 The purpose of PAIA is to foster a culture of transparency and accountability in public and private bodies by giving effect to the right of access to information, and to actively promote society in which the people of South Africa have effective access to information to enable them to more fully exercise and protect all of their rights.
- 1.3 The organisation recognises everyone's right to access to information and is committed to provide access to the organisation's records where the proper procedural requirements as set out by PAIA and POPI have been met.
- 1.4 Section 9 of the Act recognises that the right to access information cannot be unlimited and should be subject to justifiable limitations, including, but not limited to:
  - 1.4.1 Limitations aimed at the reasonable protection of privacy;
  - 1.4.2 Commercial confidentiality; and
  - 1.4.3 Effective, efficient and good governance;and in a manner which balances that right with any other rights, including such rights contained in the Bill of Rights in the Constitution.
- 1.5 Availability
  - 1.5.1 The Public are able to obtain a copy of this manual on request from the Information Officer.
  - 1.5.2 Currently the company does not have a website, but this document will be updated once a website is created.

## 2 SCOPE

- 2.1 This Information Manual is relevant and has application to the companies as set out in the list below.
- 2.2 In this Information Manual, any reference to 'Riverport includes any of the entities as listed below, companies established in accordance with the law of South Africa:

COMPANY	FSP LICENSE NUMBER	REGISTRATION NUMBER
Riverport Insurance Brokers (Pty) Ltd	FSP37608	2004/020690/07
Faredrive (Pty) Ltd		2018/263177/07

## 3 Contact details of the CHIEF EXECUTIVE OFFICER AND THE INFORMATION OFFICER

*Information required by section 51(1)(a) of the Act*

Contact Person: Mr Juriaan Erwee

Postal Address: PO Box 5050, Tyger Valley, Western Cape, 7530  
Physical Address: 4<sup>th</sup> floor, CRF Building, 4 Bridal Close, Tyger Falls, Bellville, 7530  
Telephone Number: 021 492 4824  
Facsimile Number: 021 914 8173  
E-mail Address: [juriaan@buddycentral.co.za](mailto:juriaan@buddycentral.co.za)

#### **4 The Information Officer**

##### *Information required by section 51(1)(b) of the Act*

The Act prescribes the appointment of an Information Officer for public bodies where such Information Officer is responsible to, inter alia, assess requests for access to information. The head of a private body fulfils such a function in terms of section 51. BuddyCentral has opted to appoint an Information Officer to assess requests for access to information as well as to oversee its required functions in terms of the Act.

The Information Officer appointed in terms of the Act also refers to the Information Officer as referred to in the Protection of Personal Information Act 4 of 2013. The Information Officer oversees the functions and responsibilities as required in terms of both this Act as well as the duties and responsibilities in terms of section 55 of the Protection of Personal Information Act, 2013 after registering with the Information Regulator.

The Information Officer may appoint, where it is deemed necessary, Deputy Information Officers, as allowed in terms of section 17 of the Act as well as section 56 of the Protection of Personal Information Act, 2013. This is in order to render BuddyCentral as accessible as reasonably possible for requesters of its records and to ensure fulfilment of its obligations and responsibilities as prescribed in terms of section 55 of the Protection of Personal Information Act, 2003. All requests for information in terms of the Act must be addressed to the Information Officer.

##### **Contact details of the Information Officer:**

Information Officer: Ms Julicha Thelander  
Physical Address: 4<sup>th</sup> floor, CRF Building, 4 Bridal Close, Tyger Falls, Bellville, 7530  
Telephone Number: 021 492 4824  
E-mail Address: [companysecretarial@buddycentral.co.za](mailto:companysecretarial@buddycentral.co.za)

The 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.

Requests in terms of the 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 regulations regarding the Act published under Government Notice No. R187 of 15 February 2002.

A copy of the guide by the Information Regulator (South Africa) may be obtained by contacting the Information Regulator at:

Contact Body: The Information Regulator (South Africa)  
 Postal Address: PO Box 31533, Braamfontein, Johannesburg, 2001  
 E-mail Address: [PAIACompliance@infoeregulator.co.za](mailto:PAIACompliance@infoeregulator.co.za)  
 Website: <https://www.justice.gov.za/infoereg/index.html>

## 5 Records automatically created

*Information required by section 51(1)(c) of the Act*

A section 52(2) notice regarding categories of records, which are available without a person having to request access in terms of the Act, has to date not been published.

## 6 Records made available in accordance with other Legislation

*Information required by section 51(1)(d) of the Act*

Records are held in accordance with the following legislation and any amendments thereto-

LEGISLATION (List not exhaustive)	LEGISLATION (List not exhaustive)
Basic Conditions of Employment Act	Companies Act
Compensation of Occupational Injuries & Diseases Act	Consumer Protection Act
Constitution of the Republic of South Africa	Employment Equity Act
Electronic Communications and Transactions Act	Financial Sector Code
Financial Advisory & Intermediary Services Act	Financial Services Board Act
Financial Intelligence Centre Act	Long-term Insurance Act
Financial Services Ombud Schemes Act	National Credit Act
Income Tax Act	Employment Equity Act
Labour Relations Act	Occupational Health & Safety Act
Prevention and Combatting of Corrupt Activities Act	Promotion of Access to Information Act
Promotion of Equality and Prevention of Unfair Discrimination Act	Protection of Constitutional Democracy against Terrorist and related activities Act
Protection of Personal Information Act	Short-term Insurance Act
Skills Development Act	Trademarks Act
Unemployment Insurance Act	Value Added Tax Act
Communications and Provision of Communication-related Activities Act	Unemployment Insurance Fund

## 7 Subjects and categories of Records

*Information required by section 51(1)(e) of the Act*

7.1 The following categories of records and related subjects are held (list not exhaustive)-

Category:	Record:	Availability:	Purpose:	Data Subject:
Public Affairs	Public Product Information	Freely Available	Convey Public Information	Organisation
	Public Corporate Records	Freely Available	Convey Public Information	Organisation
	Media Releases	Freely Available	Convey Public Information	Organisation
	Published Newsletters	Freely Available	Convey Public Information	Organisation
	Magazine Articles	Freely Available	Convey Public Information	Organisation
Regulatory & Administrative	Permits, Licenses or Authorities	Freely Available	Statutory Requirement	Organisation
	Conflict of Interest Management Policy	Freely Available	Statutory Requirement	Organisation
	Complaints Policy	Freely Available	Statutory Requirement	Organisation
	FICA Internal Rules	PAIA Request	Statutory Requirement	Organisation
	Health & Safety Plan	PAIA Request	Statutory Requirement	Organisation
	Memorandum of Incorporation	PAIA Request	Statutory Requirement	Organisation
	Minutes of Board or Directors Meetings	PAIA Request	Statutory Requirement	Organisation
	Register of Members	PAIA Request	Statutory Requirement	Organisation
	Register of Board of Directors	PAIA Request	Statutory Requirement	Organisation
	Internal correspondence (e-mails/memos)	PAIA Request	Internal Communications	Employees
	Insurance Policies held by organisation	PAIA Request	Risk Management	Organisation
Human Resources	Employment Applications	PAIA Request	Internal Referencing	Employees
	Employment Contracts	PAIA Request	Contractual Agreement	Employees
	Personal Information of Employees	PAIA Request	Internal Referencing	Employees
	Employment Equity Plan	PAIA Request	Statutory Requirement	Organisation
	Medical Aid Records	PAIA Request	Internal Referencing	Employees
	Pension Fund Records	PAIA Request	Internal Referencing	Employees
	Disciplinary Records	PAIA Request	Statutory Requirement	Employees
	Performance Management Records	PAIA Request	Internal Referencing	Employees
	Salary Records	PAIA Request	Internal Referencing	Employees
	Employee Benefit Records	PAIA Request	Internal Referencing	Employees
	PAYE Records	PAIA Request	Statutory Requirement	Employees
	Seta Records	PAIA Request	Statutory Requirement	Employees
	Disciplinary Code	PAIA Request	Statutory Requirement	Organisation
	Leave Records	PAIA Request	Internal Referencing	Employees
Training Records	PAIA Request	Internal Referencing	Employees	

	Training Manual	PAIA Request	Internal Referencing	Organisation
Financial	Financial Statements	PAIA Request	Internal Referencing	Organisation
	Financial and Tax Records	PAIA Request	Statutory Requirement	Organisation
	Asset Register	PAIA Request	Internal Referencing	Organisation
	Management Accounts and Reports	PAIA Request	Internal Referencing	Organisation
	Vouchers, Cash Books and Ledgers	PAIA Request	Internal Referencing	Organisation
	Banking Records and Statements	PAIA Request	Internal Referencing	Organisation
	Electronic Banking Records	PAIA Request	Internal Referencing	Organisation
Marketing	Market Information	PAIA Request	Internal Referencing	Organisation
	Product Brochures	PAIA Request	Internal Referencing	Organisation
	Advertisements	PAIA Request	Internal Referencing	Organisation
	Field Records	PAIA Request	Internal Referencing	Organisation
	Performance Records	PAIA Request	Internal Referencing	Organisation
	Product / Service Sales Records	PAIA Request	Internal Referencing	Organisation
	Marketing Strategies	PAIA Request	Internal Referencing	Organisation
Client Customer	Customer / Client Database	PAIA Request	Internal Referencing	Customers
	Customer / Client agreements	PAIA Request	Internal Referencing	Customers
	Customer / Client Files	PAIA Request	Internal Referencing	Customers
	Customer / Client Instructions	PAIA Request	Internal Communications	Customers
	Customer / Client Correspondence	PAIA Request	External Communications	Customers
Third Party	Rental agreements	PAIA Request	Contractual Agreement	Third Party
	Franchise agreements	PAIA Request	Contractual Agreement	Third Party
	Non-disclosure agreements	PAIA Request	Risk Management	Third Party
	Letters of Intent	PAIA Request	Contractual Agreement	Third Party
	Supplier Contracts	PAIA Request	Contractual Agreement	Third Party

## 8 Request for Access to Records

*Information required by section 51(1)(e) of the Act*

To facilitate the processing of your request, kindly complete and submit the form below to the e-mail address of the Information Officer indicated in ANNEXURE A.

The Information Officer will notify the requester that a request for access has been received and that the prescribed fee (if any) is payable prior to processing the request. Please refer to 10 below for a full breakdown of fees payable. Personal requesters will not be charged a request fee. The notice must state:

- 8.1.1 The amount of the deposit payable (if any);
- 8.1.2 That the requester may lodge a complaint with the Information Regulator or an application with a court against the tender or payment of the request fee, or the tender or payment of a deposit, as the case may be; and
- 8.1.3 The procedure (including the period) for lodging the complaint with the Information Regulator or the application.

Except to the extent that the provisions regarding third party notification may apply, the Information Officer and / or Deputy Information Officer to whom the request is made, must as soon as reasonably possible, but in any event within 30 days, after the request has been received in the prescribed format:

- 8.1.4 Decide in accordance with the Act whether to grant the request; and
- 8.1.5 Notify the requester of the decision and, if the requester stated that he or she wishes to be informed of the decision in any other manner, inform him or her in that manner, if it is reasonably possible.

It is important to note that the successful completion and submission of an access request form does not automatically allow the requester access to the requested record. The Act provides a number of grounds on which a request for access to information must be refused. These grounds mainly comprise of the instances referred to in Chapter 4 of the Act, indicated in 11 below.

Should all reasonable steps have been taken to find a record requested, and there are reasonable grounds for believing that the record:

- 8.1.6 Is in Riverport's possession, but cannot be found; or
- 8.1.7 Simply does not exist,

The head of Riverport must, by way of affidavit or affirmation, notify the requester that it is not possible to provide access to that record. The affidavit or affirmation must provide full account of all steps taken to find the record in question or to determine whether the record exists, as the case may be, including all communication with every person who conducted the search on behalf of the head.

When completing the form please:



- 8.1.8 indicate the identity of the person seeking access to the information and provide sufficient proof by including a copy of identification document;
- 8.1.9 provide sufficient particulars to enable the Information Officer to identify the information requested;
- 8.1.10 specify the format in which the information is required;
- 8.1.11 indicate the contact details of the person requiring the information;
- 8.1.12 indicate the right to be exercised and/or to be protected, and specify the reasons why the information required will enable the person to protect and/or exercise the right;
  
- 8.1.13 where the person requesting the information wishes to be informed of the decision of the request in a particular manner, state the manner and particulars to be so informed; and
- 8.1.14 if the request for information is made on behalf of another person, submit proof that the person submitting the request, has obtained the necessary authorisation to do so.

If it is reasonably suspected that the requester has obtained access to records through the submission of materially false or misleading information, legal proceedings may be instituted against such requester.

## 9 Other Information as may be prescribed

*Information required by section 51(1)(f) of the Act*

The following applies to requests (other than personal requests):

- A requester is required to pay the prescribed fees before a request will be processed;
- If the preparation of the record requested requires more than the prescribed hours, a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted);
- A requestor may lodge an application with a court against the tender / payment of the request fee and / or deposit;
- Records may be withheld until the fees have been paid; and

<b>N</b>	<b>Description</b>	<b>Fee</b>
1.	The request fee payable by every requester	R140.00
2.	Photocopy/printed black & white copy of A4-size page	R2.00
3.	Printed copy of an A4 size page	R2.00
4.	For a copy in a computer-readable form on:	
	i. Flash drive (to be provided by requester)	R40.00
	ii. Compact disc:	
	- If provided by requestor	R40.00
	- If provided to the requestor	R60.00
5.	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotation from Service provider.
6.	Copy of visual images	
7.	Transcription of an audio record, per A4-size page	R24.00
8.	Copy of an audio record on:	
	i. Flash drive (to be provided by requester)	R40.00
	ii. Compact disc:	
	- If provided by requestor	R40.00
	- If provided to the requestor	R60.00

9.	To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation.  To not exceed a total cost of	R145.00  R435.00
10.	Deposit: If search exceeds 6 hours	One third of amount per request to items 2-8.
11.	Postage, e-mail or any other electronic transfer	Actual expense, if any."

## **10 Grounds for Refusal of Access to Records**

### *Chapter 4 of the Act*

10.1 The main grounds for refusal of a request for access to records are-

- 10.1.1 Mandatory protection of the privacy of a third party who is a natural person if its disclosure would involve the unreasonable disclosure of personal information;
- 10.1.2 Mandatory protection of the commercial information of a third party if its disclosure contains trade secrets, financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party or information disclosed in confidence by a third party if the disclosure thereof could reasonably put that third party at a disadvantage in contractual negotiations or in commercial competition;
- 10.1.3 Mandatory protection of confidential information of third parties if it is protected in terms of any agreement;
- 10.1.4 Mandatory protection of the safety of individuals and the protection of property;
- 10.1.5 Mandatory protection of records which could be regarded as privileged in legal proceedings;
- 10.1.6 The commercial information of BuddyCentral which may include trade secrets, financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of BuddyCentral, or information, the disclosure thereof could reasonably put BuddyCentral at a disadvantage in contractual negotiations or in commercial competition; and
- 10.1.7 Mandatory protection of research information of a third party or BuddyCentral.

## **11 Approval of Information Manual**

This information manual has been prepared in accordance with Section 51(1) of the Promotion of Access to Information Act, No.2 of 2000 and is hereby approved.

**12 ANNEXURE A**

**PRESCRIBED FORM C – REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY**

<b>A. Particulars of BuddyCentral</b>	
The Information Officer: Ms Julicha Thelander	
4 <sup>th</sup> Floor CRF Building, 4 Bridal Close, Tyger Falls, Bellville, 7530	
companysecretarial@buddycentral.co.za	
<b>B. Particulars of person requesting access to the record</b>	
(i) The particulars of the person who requests access to the record must be recorded below	
(ii) Furnish an address and/or fax number in the Republic to which information must be sent	
(iii) Proof of the capacity in which the request is made, if applicable, must be attached	
Full names & surname:	
Identity number:	
Postal address:	
Fax number:	
Telephone number:	
Email address:	
Capacity:	
<b>C. Particulars of person on whose behalf request is made</b>	
This section must be completed <i>ONLY</i> if a request for information is made on behalf of another person	
Full names & surname:	
Identity number:	
<b>D. Particulars of Record</b>	
(i) Provide full particulars of the record to which access is requested, including the reference number if that is known to you	
(ii) If the provided space is inadequate, please continue on a separate page and attach to this form. Please sign any additional pages	
Description of record:	
Reference number:	

Any further particulars:	

**E. Fees**

- (i) 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
- (ii) You will be notified of the amount required to be paid as the request fee
- (iii) 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
- (iv) If you qualify for exemption of the payment of any fee, please state the reason therefor

Reason for exemption:	

**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 hereunder, please state your disability and indicate in which form the record is required

Disability:	

Form in which required:	

Mark the appropriate box with an "X"

- (i) Your indication as to the required form of access depends on the form in which the record is available
- (ii) Access in the form requested may be refused in certain circumstances, In such a case you will be informed of access will be granted in another form
- (iii) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested

1) If the record is in written or printed form:	
<input type="checkbox"/> copy of record	
<input type="checkbox"/> inspection of record	
2) If record consists of visual images:	
<input type="checkbox"/> view the images	
<input type="checkbox"/> copy of the images	
<input type="checkbox"/> transcription of the images	

3) If the record consists of recorded words or information which can be reproduced in sound:	
▪ listen to the soundtrack	
▪ transcription of the soundtrack	
4) If the record is held on computer or in an electronic or machine-readable form:	
▪ printed copy of record	
▪ copy in computer readable form	
Please indicate the preferred method of delivery	
▪ By hand	
▪ Email	
▪ Post	
▪ Fax	
<b>G. Particulars of right to be exercised or protected</b>	
If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all additional folios.	
Indicate which right is to be exercised or protected:	
Explain why the record requested is required for the exercise or protection of the aforementioned right:	
<b>H. Notice of decision regarding the request for access</b>	
You will be notified in writing whether your request has been approved / denied. If you wish to be informed thereof 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?	
<b>I. Signature page</b>	
Signed at:	
Date:	
Signature of Requester / Person on whose behalf request is made:	