

PROMOTION OF ACCESS TO INFORMATION MANUAL

Preamble

The Promotion of Access to Information Act, 2000 (“**PAIA**”) seeks to give natural and/or juristic persons the right of access to records held by either a private or public body, subject to certain limitations, in order to enable them to exercise or protect their rights.

Section 51 of PAIA obliges private bodies to compile a manual which would assist a person to obtain access to information held by such a private body and stipulates the minimum requirements a manual has to comply with. In terms of section 51(2). This manual will be updated as and when the need arises.

Objectives of Manual

The objectives of the Manual are:

- To provide a list of all records held by Finfloor (SA) (Pty) Ltd (“**Company**”);
- To set out the requirements with regard to who may request information in terms of PAIA as well as the grounds on which a request may be denied;
- To define the manner and form in which a request for information must be submitted.

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

The Act provides that a person may only request information in terms of PAIA, if the information is required for the exercise or protection of a right. Information will therefore not be furnished unless a person clearly provides sufficient particulars to enable the Company to identify the right the requester is seeking to protect as well as an explanation of why the requested information is required for the purpose of protection of that right.

Revision History

Date	Version	Description	Author
June 2021	1	Promotion of access to information Act. Manual	Information Officer

Approved by: Jason Kozinsky
Helene Uys

Date: 30

June

2021



FINfloor (S.A.) (PTY) Ltd
P.O. BOX 2867
DURBAN
SOUTH AFRICA
4000
REG No: 1998/002942/07
VAT: 4460171756
Tel: (031) 579 4631
Fax: (031) 579 5599
E-mail: info@finfloor.co.za

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1. INTRODUCTION TO THE COMPANY

Finfloor (SA) (Pty) Ltd (the “Company”) was set up in early 1996 Finfloor started off as a distributor of quality laminate floors. Over the past 20 years they have been successfully building relationships and securing ties with laminate, solid engineered wood and vinyl manufacturers all over the world enabling us to offer our products and services at the most competitive pricing. Finfloor has a national distribution base with offices in Durban, Johannesburg and Cape Town, thereby enabling them to store flooring, dispatch flooring and recommend installation teams throughout South Africa.

2. COMPANY DETAILS

2.1. Details of the Company entities to which this manual applies:

Registered Name	Registration Number
Finfloor (SA) (Pty) Limited	1998/002942/07

2.2. Contact details:

Registered Address:	11 Olympia Street Eastgate, Sandton 2196
Postal Address:	Po Box 2867 Durban 4000
Telephone Number	+27- 11-262-2727
CEO Finfloor (SA) (Pty) Ltd Limited	Sasha Kozinsky
Designated Information Officer	Sasha Kozinsky
Email address of Information Officer	info@finfloor.co.za
Website	www.finfloor.co.za

3. PAIA AND POPIA

- 3.1. PAIA 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. The Protection of Personal Information Act 4 of 2013 ('**POPIA**') gives effect to the constitutional right to privacy. One of the data processing principles under POPIA is that of data subject participation, which allows for data subjects (a person) to access and correct their personal information held by a responsible party (an entity or person processing personal information about another person). This manual provides the form for a data subject to request this information from the Company.
- 3.3. Requests in terms of the Act must be made in accordance with the prescribed procedures, at the rates provided. The forms and tariff are dealt with in Regulations 6 and 7 of PAIA.
- 3.4. Requesters are referred to the Guide in terms of Section 10 of PAIA which will contain information for the purposes of exercising Constitutional Rights. The Guide has been compiled by the South African Human Rights Commission ('**SAHRC**') and will be updated and made available by it until 30 June 2021, where after it will be updated and made available by the Information Regulator. The Guide is available in all of the official languages.
- 3.5. The contact details of the SAHRC are:

Postal Address:	Private Bag X2700 Houghton
Telephone:	+27 11 484 8300
Fax:	+27 11 484 0582
Website:	www.sahrc.org.za
Email:	paia@sahrc.org.za

- 3.6. The contact details of the Information Regulator are:

Postal Address:	P.O. Box 31533 Braamfontein Johannesburg 2017
Website:	www.justice.gov.za/infoereg/index.html
Complaints Email:	complaints.IR@justice.gov.za
General Enquiries Email:	infoereg@justice.gov.za

4. NOTICES (SECTION 51(1)(C) OF THE ACT)

- 4.1. At this stage, no notice(s) has/have been published by the Minister on the categories of information available without a person having to request access in terms of PAIA. However, as indicated above, certain records / information are freely available on our website.

5. RECORDS WE HOLD

- 5.1. The Company maintains records, including but not limited to the categories and subject matters outlined in Schedule 1.
- 5.2. Please take note that the mere fact that the information of the Company is listed in the manual does not mean that the information will be made available to a person requesting it. The Company has the right to refuse a request for information should any of the grounds of refusal as set out in Chapter 4 of PAIA, apply.

5.3. All requests for access will be evaluated on a case-by-case basis in accordance with the provisions of PAIA.

There may be applicable grounds of refusal of such a request, as set out in PAIA.

5.4. We may, for instance, refuse access to certain records in terms of the Act to protect:

- someone else's privacy;
- our confidential information;
- information that by agreement between us and a third party, is confidential (for example the content of a confidential agreement);
- another company's personal, commercial or confidential information;
- someone else's confidential information;
- the safety of individuals and property;
- records that are privileged in legal proceedings;
- research information; or
- commercial activities of the Company, which may include trade secrets, intellectual property, proprietary information, financial information, commercial information or technical information which disclosure would likely cause harm to the business interests of the Company.

5.5. We will notify you, in writing, within 30 (thirty) calendar days after we have received a completed Request for Access form, whether your request has been approved or denied. We will notify you that it is not possible to give access to a particular record if we cannot find a requested record or if it does not exist.

6. INFORMATION AVAILABLE IN TERMS OF OTHER LEGISLATION

6.1. Where applicable to our operations, information is also available in terms of certain provisions of applicable statutes (as they may be amended from time to time), including but not limited to:

- Basic Conditions of Employment Act 75 of 1997
- Broad Based Black Economic Empowerment Act 53 of 2003
- Companies Act 71 of 2008
- Competition Act 89 of 1998
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Consumer Protection Act 68 of 2008
- Constitution of the Republic of South Africa Act 108 of 1996
- Copyright Act 98 of 1978
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998
- Employment Tax Incentive Act 26 of 2013
- Financial Intelligence Centre Act 38 of 2001
- Independent Communications Authority of SA Act 13 of 2000 (ICASA)
- Income Tax Act 58 of 1962
- Intellectual Property Laws Amendment Act 28 of 2013
- Labour Relations Act 66 of 1995
- National Credit Act 34 of 2005
- Occupational Health and Safety Act 85 of 1993
- Patents Act 57 of 1978
- Pension Funds Act 24 of 1956
- Prevention and Combatting of Corrupt Activities Act 12 of 2004
- Prevention of Organized Crime Act 121 of 1998
- Private Security Industry Regulating Act 56 of 2001

- Private Security Industry Levies Act 23 of 2002
- Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000
- Protection of Personal Information Act 4 of 2013
- Regulation of Interception of Communications and Provision of Communication-Related Information Act 70 of 2002 (RICA)
- South African Revenue Services Act 34 of 1997
- Skills Development Act 97 of 1998
- Skills Development Levies Act 97 of 1998
- Tax Administration Act 16 of 2016
- Trademarks Act 94 of 1993
- Unemployment Insurance Act 63 of 2001
- Unemployment Insurance Contributions Act 4 of 2002
- Value Added Tax Act 89 of 1991

7. SCHEDULE OF PERSONAL INFORMATION PROCESSED BY THE COMPANY

- 7.1. The personal information processed by the Company, the purpose of such processing, the categories of data subjects and applicable information held in terms of POPIA is set out in Schedule 2.
- 7.2. The personal information is held in the Republic of South Africa ("RSA"). The Company may transmit personal information to its authorised third parties and/or other companies and use hosting or cloud services to store and process personal information that are not located in the RSA under certain circumstances. If it does so, it will ensure that the level of protection given to the personal information that is transmitted outside RSA is at least as good as that provided for under RSA law, either by means of a binding contract with the service provider, or by using a service provider located in a country with privacy laws of similar or stronger effect.
- 7.3. The Company acknowledges the sensitivity and confidential nature of your personal information and has taken all appropriate, reasonable technical and organisational measures to ensure that the personal information processed by the Company is safeguarded in accordance with market standards, including, but not limited to:

7.3.1. information security management systems;

7.3.2. operations and system integrity;

- policy and procedures for processes, such as reporting operational failures, incidents, system problems, concerns, and user complaints (and the process for doing so), are made available to users and are approved by management;
- system capacity is reviewed periodically, and action items are defined for capacity issues;
- data, transactions, and programs are backed up at a server level regularly and encrypted;
- system operations will make use of Perimeter Firewalls including VPN access for support processes;

7.3.3. physical security;

- ensuring physical security measures are in place at all times, including, but not limited to, having an alarm system in place; locking of all doors to the office;

7.3.4. access control;

- access to security operations centre and processing operations is granted to employees and contractors who have a legitimate business need for such access privileges;
- access will require a unique identification to establish accountability with user logins;
- access tags, perimeter fencing and in-house staffing;
- security and privacy enhancing technologies;

- 7.3.5. awareness, training and security checks in relation to all employees;
- background or verification checks are performed on employees when appropriate and permitted by law;
 - employees are required to read and accept a statement of confidentiality and undertake appropriate data security awareness training during on-boarding;
 - employee training is regularly undertaken and performed to maintain employee competency and effectiveness and ensure familiarity with all aspects of POPI if they are required to process personal information;
 - incident and response management;
- 7.3.6. business continuity;
- business continuity and disaster recovery plans, including restoration of backups, are tested at least annually with the system configured to provide failover capabilities to permit the resumption of critical operations;
- 7.3.7. audit controls; and
- 7.3.8. due diligence.

8. FORM OF REQUEST

8.1. Schedule 3 – Completion of Form C

- 8.1.1. As prescribed by PAIA, any request for information must be contained in Form C, which is available from the Information Regulator's website (<https://www.justice.gov.za/infocreg/docs.html>). For the convenience of requesters, a copy of this form is included in this manual (Annexure 1 – Form C).
- 8.1.2. Form C must be completed in full and returned to the Company for attention of the Information Officer, together with any other information that the Company requires in order to consider and decide on the request. A request which does not comply with the formalities prescribed by PAIA will be sent back to the requester with advice on the necessary steps for compliance (this includes forms that are not completed in full).
- 8.1.3. A requester needs to provide the Company with sufficient details to enable it to identify:
- The record(s) requested;
 - The requester (and if an agent is lodging the request, proof of capacity);
 - The form of access required;
 - The postal address or fax number of the requester within RSA;
 - If the requester wishes to be informed of the decision in any manner (in addition to written), the manner and particulars thereof;
 - The right which the requester is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right.
- 8.1.4. The Company will not consider a request unless it is contained in Form C. The Company will make copies of the form available on request.

8.2. Proof of Identity

- 8.2.1. Proof of identity is required to authenticate the request and the requester.
- 8.2.2. As a result, a requester will, in addition to Form C, be required to submit acceptable proof of identity such as a certified copy of their identity document or other legal forms of identity.

8.3. Notification Period

- 8.3.1. All requests complying with the requirements set out above will be processed and considered expeditiously.
- 8.3.2. The requester will be given notice of the decision once made, in writing, whatever the decision may be. PAIA requires that such notification be given within 30 (thirty) days of the decision being made. In case of a request being refused, the notification will include the reasons for the refusal.

- 8.3.3. Please note that the Company may extend the 30-day notice period if it is necessary due to the nature of the request and the amount of time required to gather the requested information. The requester will however be given notice of the extension prior to the expiry of the 30-day period.
- 8.3.4. The Information Officer of the Company will then make a decision on the request and notify the requester in the required form.

9. FEES

9.1. Request Fee (not applicable to a personal requester)

- 9.1.1. The requester needs to pay the request fee as prescribed by the Minister for Justice and Constitutional Development, before the request will be processed.
- 9.1.2. Please see the following link to see the prescribed fees: <https://www.justice.gov.za/paia/PAIA-brochure.pdf>

9.2. Deposit (not applicable to a personal requester)

- 9.2.1. The requester needs to pay a deposit if the search and the preparation of the requested records are estimated to take more than 6 (six) hours.

9.3. Access Fee

- 9.3.1. The requester needs to pay an access fee as prescribed by the Minister for Justice and Constitutional Development to enable the Company to recover the cost of processing a request and giving access to records in terms of PAIA.
- 9.3.2. Please see the following link to see the prescribed fees: <https://www.justice.gov.za/paia/PAIA-brochure.pdf>
- 9.3.3. Please note: A request will not be processed until the prescribed fees have been paid and where a decision to grant a request has been taken, the record will not be disclosed until the necessary fees have been paid in full.

10. LEGISLATION

- 10.1. This manual should be read in conjunction with PAIA as well as POPIA.

11. AVAILABILITY OF THE MANUAL

- 11.1. This manual is available, free of charge, at the offices of the Company, or in electronic format on the websites indicated above and from the SAHRC and Information Regulator (as soon as it is published).

12. RESERVATION OF RIGHTS

- 12.1. Nothing in this manual is to be construed as a waiver of the right to the confidentiality of any document or any legal privilege or right of non-disclosure attaching to any document mentioned herein, whether in terms of any statute or under the common law. All rights in this regard are fully reserved.

SCHEDULE 1 – RECORDS AVAILABLE IN TERMS OF PAIA

Category	Subject	Availability
Communication	Public product information	Available
	Media releases	Available
	Promotion of Access to Information Act Manual	Available
	Internal and external correspondence	May not be disclosed
	News and publications	Available
	Finfloor finfloor.co.za websites	Available
	Inovar Inovar.co.za websites	
Human Resources	General identification and contact information such as: the employee's name, physical and postal address, e-mail address, telephone / mobile number, nationality / ethnicity, race, gender, age, marital status, date of birth and on-line activity records	May not be disclosed
	Medical condition, disability and health status. We may also obtain sensitive information if personnel voluntarily provide it to us (such as preferences regarding medical treatment based on religious beliefs)	May not be disclosed
	Identification, passport and reference numbers issued by government bodies or agencies	May not be disclosed
	System and user identification names / numbers and certain passwords	May not be disclosed
	Any personal records provided to us by the employee / prospective employee	May not be disclosed
	Financial information and bank account details	May not be disclosed
	Employment contracts	May not be disclosed
	Disciplinary records	May not be disclosed
	Employment equity plan	Limited disclosure only on request
	Internal KPI / appraisal evaluation and disciplinary records and outcomes	May not be disclosed
	Information about an employee's / potential employee's criminal record	May not be disclosed
	Employment, educational, financial history and information	May not be disclosed



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Category	Subject	Availability
	Next of kin / spouse / partner contact information	May not be disclosed
	Skills development programme	Limited disclosure only on request
	Salaries and wages records	May not be disclosed
	Documents relating to employee benefits	May not be disclosed
	Disciplinary code	Limited disclosure only on request
	Personnel Guidelines, Policies and Procedures	May not be disclosed
	Leave records	May not be disclosed
	Personal information of past, present and prospective employees and officer / directors	May not be disclosed
	Banking details	May not be disclosed
	PAYE records	May not be disclosed
	Documents issued to employees for income tax purposes	May not be disclosed
	Records of payments made to SARS on behalf of	May not be disclosed
	UIF records	May not be disclosed
	Pension fund data and correspondence	May not be disclosed
	Employee movement records throughout the buildings (use of access tags)	May not be disclosed
	Various employment forms and documentation required such as: attendance registers, Covid-19 check-in information, theory assessments and practical assessments and polygraph results)	May not be disclosed
Customer and Prospective Customers Records	General identification and contact information such as: customer and/or its employees' name, physical and postal address, e-mail addresses, telephone / mobile numbers, system and user identification numbers and passwords, and activity records (such as customer / employee driving behaviour)	May not be disclosed



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Category	Subject	Availability
	Registration / Identification and passport numbers issued by government bodies or agencies	May not be disclosed
	Service Agreements	May not be disclosed
	VIN number and registration number of customer vehicle	May not be disclosed
	Vehicle colour, make and model	May not be disclosed
	Location information of customer vehicle (for example, vehicle coordinates)	May not be disclosed
	Product or system account information	May not be disclosed
	Bank account details and invoices	May not be disclosed
	Credit history and credit score and other financial information	May not be disclosed
	Telephone recordings / voice logged agreements	May not be disclosed
	Recordings of telephone calls to and from our representatives and call centres	May not be disclosed
	Information to investigate crime, including fraud and laundering (for example, we will share information with insurers who are investigating an insurance claim or with the SAPS who are investigating a criminal matter)money	Limited disclosure only on request
	Information enabling us to provide products and services	May not be disclosed
	Corporate customer business certificates and validation(such as: statutory documents, B-BBEE certificates / affidavits and tax compliance status)	May not be disclosed
	Corporate customer photo or video clips of vehicle in-cab or outside cab if our video enabled products and services are used	May not be disclosed
	Corporate customer vehicle driver details (name, surname, system and user identification details, driving behaviour and location data)	May not be disclosed
	Emergency contact information	Limited disclosure only on request



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Category	Subject	Availability
Third Party Vendors	General identification and contact information such as the third party vendor and/or its employees' name, physical and postal address, e-mail addresses, telephone / mobile numbers, system and user identification numbers and passwords, and activity records (of Company systems / platforms)	May not be disclosed
	Registration numbers issued by government bodies or agencies	May not be disclosed
	Service Provider / Partner / Supplier / Service	May not be disclosed
	Product or system account information	May not be disclosed
	Bank account details and invoices	May not be disclosed
	Recordings of telephone calls to and from our representatives	May not be disclosed
	Information enabling us to provide products and services Business certificates and validation (for example: statutory documents, B-BBEE certificates / affidavits and tax compliance status)	May not be disclosed
Immovable and Movable Property	Asset register	Limited disclosure only on request
	Agreements for the lease of immovable property	May not be disclosed
	Agreements for the lease or sale of movable property Credit sale agreements and/or hire purchase agreements	May not be disclosed
	Other agreements for the purchase, ordinary sale, conditional sale or hire of assets	May not be disclosed
		May not be disclosed



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Category	Subject	Availability
Financial Information	Audited Integrated Annual Financial Statements	May not be disclosed
	Financial and accounting records	May not be disclosed
	Banking details	May not be disclosed
	Insurance records	May not be disclosed
	Tax compliance documents and tax returns	May not be disclosed
	Accounting records	May not be disclosed
	Bank statements	Available
	Invoices in respect of creditors and debtors	Certain reports Available
	Details of auditors	Certain reports Available
	Auditors' reports in respect of audits conducted	
Information Technology	Computer software, support and maintenance agreements, warranty claim information, testing and commissioning.	May not be disclosed
Information relating to legal proceedings	Records relating to legal proceedings involving the Company generally	May not be disclosed
	Disclosures relating to legal proceedings involving the Company which are material to the enforcement of rights	Limited disclosure only on request with exceptions
General Records	Customer, third-party vendor, supplier and document databases	May not be disclosed
	BBBEE Certificates of Subsidiaries of Group Holding Company	Available upon request
	BBBEE Certificate of Group Holding Company	Available
	Commercial agreements	May not be disclosed
	Statutory records	Available upon request
	Organisational structure	Available upon request



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Category	Subject	Availability
Intellectual Property	List of trademarks, copyrights and designs held and pending applications Records relating to domain names Licenses relating to intellectual property rights	Available upon request Available upon request Limited disclosure only on request
Company Records	Documents of incorporation Memorandum of Incorporation Board and Shareholder minutes of meetings Records relating to the appointment of directors / auditors / company secretary / public officer and other officers – Group Holding Company Records relating to the appointment of directors / auditors / company secretary / public officer and other officers – Subsidiaries of Group Holding Company Securities registers and other statutory documentation and reports	Available upon request Limited disclosure only on request May not be disclosed Limited disclosure only on request Limited disclosure only on request Limited disclosure only on request



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SCHEDULE 2 – PERSONAL INFORMATION PROCESSED IN TERMS OF POPIA

Personal Information	Purpose of Processing	Data Subjects it relates to	Valid Recipients
<p>Employee Personal Information, including:</p> <ul style="list-style-type: none"> • General personal information - name, physical address, postal address, e-mail address, telephone or mobile number, nationality / ethnicity, race, gender, age, marital status, date of birth, sexual orientation, language, etc.; • Identification numbers - copies of drivers licence, identity or passport documentation, associated numbers and other reference numbers issued by government bodies or agencies (such as SARS); • Medical information - medical condition, disability and health status (physical and mental). Company may also obtain sensitive information if employee voluntarily provides it to Company (such as preferences regarding medical treatment based on religious beliefs); • Financial information - bank account number and account details, payslips, IRP5s, credit history and checks, and other financial information; • Employment history - curriculum vitae, academic records, copies of qualification certificates, employment and educational history and information; 	<p>Managing employment relationship, including:</p> <ul style="list-style-type: none"> • To enable Company to consider, assess and review employee's application, qualification, skills, suitability for the position, and all such other documentation and information provided to Company, for an employment, consultancy, fixed term or learnership position with Company; • To enable Company to interview employee based on application, qualification, skills, suitability and documentation provided; • To enable Company to carry out background and reference checks, where applicable; • To enable Company to ensure the on-boarding process is smooth if application is successful; • To enable Company to keep records relating to hiring process, if successful; • To enable Company to administer employee's Personal Information as required by law and/or regulation; • To enable Company to identify employee and enter into an agreement; 	<p>Past, prospective and current employees, consultants and learners of the Company.</p>	<p>Employee, consultant or learner whose data it relates to.</p> <p>Affiliate, subsidiary, partner, contractor and the like, where relevant.</p> <p>SARS.</p> <p>Pension funds.</p> <p>Medical aid.</p> <p>Department of Labour.</p> <p>Relevant authorities if required by law or a court order.</p>



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Personal Information	Purpose of Processing	Data Subjects it relates to	Valid Recipients
<ul style="list-style-type: none"> • Business system information - system and user identification names / numbers and certain passwords; on-line activity records; and employee movement / access records throughout the buildings (use of access tags); • Provident fund - provident fund information, payments and correspondence; and • General information - information Company obtains during an interview process; signed Agreements, policies and procedures; professional membership; internal KPI / appraisal evaluation and disciplinary records and outcomes; information about employee's criminal record; polygraph assessments, PSIRA and or other business related industry certification and communications; leave information; next of kin, spouse or partner contact information; and various employment forms and documentation required such as: attendance registers, theory assessments, practical assessments and the results thereof. 	<ul style="list-style-type: none"> • To enable Company to carry out any Agreement/s that may exist between employee and Company; administer the relationship and Agreement with employee, resolve any employment relationship issues which may occur, and any other employment-related purposes; • To enable Company to process termination of employment, if and when ultimately required; • To enable Company's finance department to pay employee's salary / consultancy fees / stipend and make any other relevant regulatory contributions required (such as PAYE, medical aid, etc.); • To enable Company to vet employee's credit history and score with a registered credit bureau; • To enable Company to assess employee's training and development needs; monitor performance; manage career and talent; • To enable Company to hand over any legal matter that may arise between employee and Company's legal advisors; • To enable Company to provide required information as required by law or a governmental authority. 		



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Personal Information	Purpose of Processing	Data Subjects it relates to	Valid Recipients
<p>Customer Personal Information, including:</p> <ul style="list-style-type: none"> • General Personal Information - name, physical address, postal address, e-mail addresses, telephone or mobile numbers; • Identification numbers - copies of registration, identity or passport documentation, associated numbers and other reference numbers issued by government bodies or agencies; • Financial information - bank account name, number and account details, invoices, statements, credit history, credit score and other financial information; • Business system information - system and user identification or account names / numbers and certain passwords; on-line platform activity records; • Company secretarial information - statutory documents, B-BBEE certificates / affidavits and tax compliance statuses; • Contractual information - Agreement voice logs, signed Agreements, recordings of telephone calls between customer and Company and/or Company's partners (e.g. call centres); • 	<p>Managing customer relationship, including:</p> <ul style="list-style-type: none"> • To enable Company to identify customer and potentially enter into an agreement; • To enable Company to carry out obligations under any Agreement/s that may exist between customer and Company; • To enable Company's finance department to load orders to pay or invoice customer for services rendered or provided; for Company to invoice customer for the use or purchase of hardware / devices / units; or for Company to pay customer for products purchased; • To enable Company to vet customer's credit history and score with a registered credit bureau or to hand customer over for debt collection; • To enable Company to hand over any legal matter that may arise to Company's legal advisors; • To enable Company to, from time-to-time, to send customer important information regarding Company's services. Customer agrees to electronic communication from Company, for example: through SMS, email and/or telephone in order for Company to provide the services; 	<p>Past and current customers of the Company.</p>	<p>Customer whose data it relates to.</p> <p>Affiliate, subsidiary, partner, service provider, fitment centre, call centre, sales agent, insurance company, credit bureau, banking institution, contractors and the like.</p> <p>SAPS.</p> <p>Relevant authorities if required by law or a court order.</p>



FINfloor (S.A.) (PTY) Ltd
P.O. BOX 2867
DURBAN
SOUTH AFRICA
4000
REG No: 1998/002942/07
VAT: 4460171756
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Fax: (031) 579 5599
E-mail: info@finfloor.co.za

Personal Information	Purpose of Processing	Data Subjects it relates to	Valid Recipients
<ul style="list-style-type: none"> Information to provide services to customer - activity records (such as driving behaviour, harsh braking, speeding, etc.); location data or identification of an asset (asset coordinates, trip data, make, model, colour, VIN or registration number of the asset); and photo or video clips of customer or the asset, either in-asset or outside asset, if Company's video enabled services are used; and Investigation information - when crimes, including fraud, are investigated (for example, Company will share information with insurers who are investigating an insurance claim or with the South African Police Service who are investigating a criminal matter). 	<ul style="list-style-type: none"> To enable Company to process customer's request for hardware / devices / units to be installed in an asset and to provide services to customer as stipulated in the Agreement; To enable Company to track and recover customer's asset in the event that it's lost, stolen or hijacked (if customer subscribed to this specific service); To enable Company to contact customer while delivering the services; To enable Company's operations department to schedule and ensure that hardware / devices / units in an asset are installed, commissioned and maintained; To enable Company's employees or one of its call centres to assist customer in the event of any questions or queries customer may have; To enable Company to ensure the quality of its services and to ensure that it can provide services to customer at all reasonable times; To enable Company to collect and analyse customer's Personal Information and combine all the information that Company has about customer to enable Company to provide better services; 		



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	<ul style="list-style-type: none"> • To enable Company to aggregate information for statistical purposes and to develop strategic and marketing plans; • To enable Company to notify customer about changes to services, upcoming termination of customer's Agreement, or introduce customer to new services or value added services from time to time; • To enable Company to process information into aggregated and/or anonymised form for commercial purposes to enhance and/or assist service delivery and equipment generally; • To enable Company to share certain Personal Information and such other information as may be required, with an affiliate, subsidiary, partner, service provider, fitment centre, call centre, sales agent, insurance company, banking institution, contractor and the like ("Partner") to enable Company to provide services to customer; to profile various customer segments, service and asset segments to develop targeted marketing and sales activities. 		



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Personal Information	Purpose of Processing	Data Subjects it relates to	Valid Recipients
<p>Third Party Vendors' Personal Information, including:</p> <ul style="list-style-type: none"> • General Personal Information - name, physical address, postal address, e-mail addresses, telephone or mobile numbers; Identification numbers - copies of registration, identity or passport documentation, associated numbers and other reference numbers issued by government bodies or agencies; • Financial information - bank account name, number and account details, invoices, statements, credit history, credit score and other financial information; • Business system information - system and user identification or account names / numbers and certain passwords; on-line platform activity records; • Company secretarial information - statutory documents, B-BBEE certificates / affidavits and tax compliance statuses; Private Security Industry Regulatory Authority (PSIRA), Motor Vehicle Security Association of South Africa (VESA), and/or any other business related industry certification; and 	<p>Managing third party vendor relationship for services to be provided, including:</p> <ul style="list-style-type: none"> • To enable Company to identify vendor and potentially enter into an agreement; • To enable Company to carry out any Agreement/s that may exist between vendor and Company; • To enable Company's finance department to pay or invoice vendor for services rendered or provided; for Company to invoice vendor for the use or purchase of hardware / devices / units; or for Company to pay vendor for products purchased; • To enable Company to vet vendor's credit history and score with a registered credit bureau or to hand vendor over for debt collection; • To enable Company to hand over any legal matter that may arise to Company's legal advisors; • To enable Company to tender or submit a proposal for a customer agreement, where vendor's products and/or services are required to enable Company to provide services, hardware / devices / units; 	<p>Past and current third party vendors of the Company.</p>	<p>Third party vendor whose data it relates to. Affiliate, subsidiary, partner, service provider, fitment centre, call centre, sales agent, insurance company, credit bureau, banking institution, contractors and the like. Relevant authorities if required by law or a court order.</p>



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Personal Information	Purpose of Processing	Data Subjects it relates to	Valid Recipients
<ul style="list-style-type: none"> Contractual information - signed Agreements and other documentation, recordings of telephone calls between vendor and Company; and vendor's customers' business and asset information to enable the Company to provide the services (if any) 	<ul style="list-style-type: none"> Company to provide or receive services. To enable Company to communicate with vendor to carry out any Agreement/s that may exist between vendor and Company, for example: through SMS, email and/or telephone in order for the Company to provide the services. 		
<ul style="list-style-type: none"> Personal Information collected from COVID19 sign-in register 	<ul style="list-style-type: none"> Required to be obtained and kept in accordance with the relevant Regulations in terms of the Disaster Management Act. 	Any person entering the Company's office.	Person whose data it relates to. Affiliate, subsidiary, partner, service provider, professional consultants and the like. Relevant authorities if required by law or a court order.
Personal Information obtained from contact requests or queries submitted on the Company's website, including: <ul style="list-style-type: none"> Name Mobile number Email address 	Used to contact the prospective customer about the query.	Any person submitting a contact request or query on the Company's website.	Customer whose data it relates to. Affiliate, subsidiary, partner, service provider, fitment centre, call centre, sales agent, insurance company, credit bureau, banking institution, contractor and the like. Relevant authorities if required by law or a court order.

SCHEDULE 3 – FORM C

Request for Access to record of a Private Body

Section 53 (1) of the Promotion of Access to the Information Act 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:	
Email 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					
<p>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.</p> <p>b. You will be notified of the amount required to be paid as the request fee.</p> <p>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.</p> <p>d. If you qualify for exemption of the payment of any fee, please state the reason for exemption.</p>					
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 below, state your disability and indicate in which form the record is required.					
Disability			Form in which record is required		
Mark the appropriate box with an X.					
NOTES:					
<p>a. Compliance with your request in the specified form may depend on the form in which the record is available.</p> <p>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.</p> <p>c. The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.</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 recording, computer-generated images, sketches, etc.)					
	view the images		copy of the images*		transcription of the images*
4. 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)	
5. 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* (CD or DVD)
*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage payable.				YES	NO



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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