

HELUKABEL

Registration Number: **2010/016367/07**

For purposes of this PAIA Manual, “**the Company,**” “**we,**” “**us,**” and “**our**” mean HELUKABEL (Registration Number: **2010/016367/07**) only.

PAIA Manual

Prepared in terms of section 51 of the Promotion of Access to Information Act, No. 2 of 2000, as amended.

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1 Definitions

Term	Definition
Helukabel South Africa (Pty) Ltd / the Company	Helukabel South Africa (Pty) Ltd, registration number (insert number), a private company incorporated in the Republic of South Africa, specializing in the distribution, and supply of cables, wires, accessories, and related industrial connectivity solutions.
CEO	Chief Executive Officer of Helukabel South Africa (Pty) Ltd.
Client	Any natural or juristic person who purchases, receives, or uses products or services from Helukabel South Africa (Pty) Ltd, including distributors, industrial clients, contractors, OEMs, wholesalers, and end-users.
Complainant	Any natural or juristic person who purchases, receives, or uses products or services from Helukabel South Africa (Pty) Ltd, including distributors, industrial clients, contractors, OEMs, wholesalers, and end-users.
Conditions for Lawful Processing	The conditions for lawful processing of personal information as set out in Chapter 3 of POPIA and reflected in section 12 of this Manual.
Data Subject	Any person or entity to whom personal information relates, including customers, suppliers, distributors, employees, applicants, visitors, and online users interacting with Helukabel South Africa (Pty) Ltd.
Day	A calendar day. If the final day of a period falls on a Sunday or public holiday, such day is excluded as per the Interpretation Act, 1957 (Act 33 of 1957).
DIO	The Deputy Information Officer appointed by Helukabel South Africa (Pty) Ltd in terms of POPIA and PAIA to support compliance and information request processes.
Information Officer / IO	The individual appointed by Helukabel South Africa (Pty) Ltd in terms of PAIA and POPIA to ensure compliance and oversee access-to-information and data-protection obligations.
Manual	This PAIA Manual of Helukabel South Africa (Pty) Ltd prepared in accordance with section 51 of PAIA and section 17 of POPIA.
Minister	The Minister of Justice and Correctional Services of the Republic of South Africa.
Office Hours	((a) For the Information Regulator: 08:00–16:00, Monday to Friday (excluding public holidays). (b) For Helukabel South Africa (Pty) Ltd: Standard business hours applicable to the Company’s offices and branches.
PAIA	Promotion of Access to Information Act, No. 2 of 2000, as amended.
Personal Information	. Information relating to an identifiable living natural person or identifiable existing juristic person, including: names, identification numbers, registration details, email addresses, telephone numbers, financial details, business information, delivery addresses, credit records, purchase history, technical requests, CCTV footage, access logs, online identifiers, correspondence, and other information processed during cable manufacturing, supply chain operations, logistics, technical support, or customer service activities.
Personnel	Any individual employed by or rendering services to Helukabel South Africa (Pty) Ltd, including permanent, temporary, fixed-term employees, contractors, consultants, drivers, warehouse staff, technicians, and directors.
POPI / POPIA	Protection of Personal Information Act, No. 4 of 2013, as amended.
POPI Regulations	Regulations issued in terms of section 112(2) of POPIA.
Private Body	As defined in section 1 of PAIA, including Helukabel South Africa (Pty) Ltd as a juristic person that is not a public body
Processing	Any operation involving personal information, including collection, receipt, recording, storage, updating, retrieval, use, distribution, transmission, merging,

Term	Definition
	restriction, archiving, erasure, or destruction. For Helukabel South Africa (Pty) Ltd, this includes processing for customer orders, supplier relationships, logistics, warehousing, technical support, quality control, warranty claims, HR and payroll, CCTV, and website interactions.
Regulator	The Information Regulator established under section 39 of POPIA.
Republic	Republic of South Africa.
Signature	Any legally recognized form of signature, including electronic signatures, where permissible.
Writing	Written communication, including electronic communications generated, sent, received or stored by electronic means as defined in section 12 of the Electronic Communications and Transactions Act, 2002 (Act 25 of 2002).

2 Purpose of the PAIA Manual

This PAIA Manual is useful for the public to:

- 2.1 This PAIA Manual serves as a public guide to the records held by Helukabel South Africa (Pty) Ltd and the manner in which access requests are processed. It identifies categories of records available without a formal PAIA request and outlines the operational, manufacturing, distribution, and corporate records created in the ordinary course of the Company’s business. These records include information relating to industrial cable and wire distribution, product specifications and technical data, supply chain and logistics operations, quality assurance and compliance documentation, procurement and vendor management, warehouse and inventory management, and customer order fulfilment.

The Manual also identifies records available in terms of other applicable legislation governing the manufacturing, electrical, and engineering sectors. It further records the official contact details of the Information Officer and any Deputy Information Officer appointed for Helukabel South Africa (Pty) Ltd, who support members of the public wishing to exercise their right of access in terms of PAIA

- 2.2 The Manual explains the PAIA processes followed by Helukabel South Africa (Pty) Ltd and directs requesters to the official PAIA Guide issued by the Information Regulator. It also sets out how personal information is processed in connection with the Company’s manufacturing operations, customer and supplier relationships, distribution and logistics services, technical support, warranty management, procurement and contract administration, human resources and payroll activities, occupational health and safety compliance, quality management systems, and overall corporate governance.

It outlines the purposes of processing personal information, categories of data subjects, types of personal information processed, and the categories of recipients—both within South Africa and internationally—who may receive personal information in the usual course of business, including global Helukabel Group entities where applicable.

The Manual also confirms the implementation of appropriate technical and organisational security measures designed to protect the confidentiality, integrity, and availability of all personal information held by Helukabel South Africa (Pty) Ltd.

3 Contact Details for Access to Information Requests

3.1 Information Officer

Name	Doug Gunnewegh
Contact number	011 462-8752
Email address	Doug.gunnewegh@helukabel.co.za

3.2 Deputy Information Officer

Name	Natasha Gunnewegh, Bianca Van Dyk
Contact number	011 462-8752
Email address	natasha@helukabel.co.za; bianca@helukabel.co.za

3.3 National or head office

Postal address	P O BOX 2994
Physical address	1052 Schooner Ave, Laser Park, Honeydew, Roodepoort
Contact number	011 462 8752
Email	info@helukabel.co.za
Website	www.helukabel.co.za

4 Guide on how to use PAIA and how to Obtain Access to the Guide

4.1 The Information Regulator has published a revised PAIA Guide in terms of section 10(1) of PAIA (as amended). This guide is designed to help any person who wishes to exercise rights under PAIA or POPIA, and it is available in all official languages as well as in braille to ensure accessibility.

4.2 The Guide serves two key purposes:

4.2.1. Access to Personal Information (POPIA): It explains how individuals (data subjects) can exercise their rights to request confirmation of whether personal information is held about them, to access that information (including details of third-party recipients), and to request correction, deletion, or destruction of personal information that is inaccurate, outdated, excessive, or unlawfully obtained.

4.2.2. Access to Records (PAIA): It provides step-by-step guidance on how to request records from public or private bodies, including the required forms, the process for appeals or complaints, and how to approach a court if necessary.

4.3 In addition, the Guide offers:

4.3.1. An overview of the objectives of PAIA and POPIA.

4.3.2. Contact details of Information Officers (IOs) and Deputy Information Officers (DIOs).¹

¹ Section 56(a) of POPIA - Every public and private body must, in line with section 17 of PAIA, appoint as many Deputy Information Officers as needed to carry out the duties and responsibilities set out in section 55(1) of POPIA.

- 4.3.3. Manner and form of a request for access to a record of a public body and private body.²
- 4.3.4. Guidance on compiling or accessing PAIA Manuals.³
- 4.3.5. Information on voluntary disclosures of records, prescribed access fees, and applicable regulations.⁴
 - 4.3.1.1 How to lodge an internal appeal, a complaint with the Regulator or apply to court for a against a decision by the IO 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.
- 4.3.6. Insight into how PAIA has been amended following the implementation of POPIA.
- 4.4 The guide can also be obtained:
 - 4.4.1 Upon request to the IO: [Request for a Copy of the Guide from an Information Officer \[Regulation 3\]](#)
 - 4.4.2 From the website of the Regulator: www.inforegulator.org.za
 - 4.4.3 From the offices of the Regulator: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg OR by email: enquiries@inforegulator.org.za
- 4.5 A copy of the guide is also available in the following three official languages, for public inspection during normal office hours:
 - 4.5.1 English.
 - 4.5.2 Afrikaans.
 - 4.5.3 Zulu.

5 Latest Notices in terms of Section 52(2) of PAIA

At this stage, no notice(s) has/have been published on the categories of records that are available without having to request access to them in terms of PAIA.

6 Availability of Certain Records in terms of PAIA

6.1 Categories of records of the company which are available without a person having to request access:

Category of Records	Types of the Record	Available on Website	Available on Request
PAIA Manual	Current PAIA Manual for Helukabel South Africa (Pty) Ltd, including version reference and effective date.	X	X
Company overview	Summary of Helukabel South Africa (Pty) Ltd operations, including its role in industrial cable and wire distribution, industry sectors served, branch locations, and corporate contact details.	X	X
Product Information & Technical Catalogues	Product catalogues, technical datasheets, product specifications for cables, wires,	X	X

² In terms of PAIA, access to records of a public body (section 11) or a private body (section 50) must be granted if the requester meets PAIA's procedural requirements, the request is necessary for exercising or protecting a right (in the case of private bodies), and no grounds for refusal in Chapter 4 apply.

³ In terms of sections 14 and 51 of PAIA, the Information Officer of every public and private body must update and publish their PAIA manual at least once every 12 months.

⁴ In terms of PAIA, public and private bodies must keep their PAIA manuals (sections 14 and 51) and notices (sections 15 and 52) updated and published at least once every 12 months. When access to a record is granted, the notice must also state any access fee payable by the requester (sections 22 and 54). In addition, the Information Regulator must update and publish the official PAIA Guide at least once every two years (section 92(11)).

Category of Records	Types of the Record	Available on Website	Available on Request
	connectors, accessories, automation products, and related industrial solutions.		
Engineering Capabilities	High-level overview of product manufacturing capabilities, engineering support, quality standards, technical services, cable assembly solutions, and custom product capabilities.	X	X
Supply Chain & Distribution Overview	Distribution channels, warehousing operations, logistics processes, local and international supply arrangements, high-level delivery model, and non-personal inventory handling information.	X	X
Certifications, Standards & Quality Credentials	High-level quality assurance commitments, references to ISO standards, compliance with South African Bureau of Standards (SABS), international cable standards (e.g., IEC, VDE), and product testing processes.	-	X
Policies (Public-Facing)	Privacy notice, cookie policy, terms of use, website disclaimers, legal notices, and POPIA/PAIA-related statements.	X	X
Store and channel coverage snapshots	High level channel and regional coverage views, heatmaps or summary lists that show reach by town, province or region without personal information	X	X
Legal disclosures	Data protection statements, POPIA references, legal disclaimers, statutory compliance references, and website terms.	X	X
Public marketing materials	Brochures, product flyers, product launch announcements, media releases, case studies without identifiable customer details, industry presentations, trade show materials.	X	X
Sector and quality credentials	High-level supplier requirements, B-BBEE certificate, banking confirmation letter, HSSE requirements, vendor registration information available to customers and procurement partners	-	X
Tender or supplier onboarding info	letter and compliance information made available to customers, funders and other counterparties during onboarding	-	X
Corporate identifiers	Registered name, registration number, registered address of Helukabel South Africa (Pty) Ltd., VAT number and other statutory registration numbers	-	X
Information Officer contacts	Contact details of the Information Officer and any Deputy Information Officer	-	X

Category of Records	Types of the Record	Available on Website	Available on Request
	appointed by Helukabel South Africa (Pty) Ltd.		
Training attestations aggregated	Aggregated data showing staff completion of training relating to POPIA, PAIA, health and safety, ISO standards, quality control procedures, warehouse safety, and distributing site compliance (without employee names).	-	X
Health and safety statements	High-level SHEQ commitments, workplace safety standards, PPE requirements, safe handling of industrial materials, environmental responsibility statements, and sustainability initiatives.	-	X
Data and reporting descriptions	Generic description of categories of personal and non-personal data processed for customers, suppliers, employees, contractors, and technical support recipients, including storage and retention practices (excluding identifiers).	-	X
Whistleblowing and complaints	Ethics hotline, POPIA and PAIA complaint channels, Information Regulator details, and reporting mechanisms as published in the privacy notice.	X	X
IO registration proof	Information Officer and Deputy Information Officer registration confirmation or certificate, registration reference numbers	-	X
Company secretarial snapshot	Names of directors of Helukabel South Africa (Pty) Ltd as filed with CIPC, principal place of business.	-	X
Tax and compliance attestations	SARS Tax Compliance Status PIN, COID Letter of Good Standing, UIF registration confirmation, Workman's Compensation details, and other compliance requirements relevant to industrial operations.	-	X
Insurance confirmations	Summary of insurance cover relevant to warehousing, logistics, and product distribution operations, including public liability and product liability insurance.	-	X
Supplier Code of Conduct	Ethics, anti-bribery requirements, conflict-of-interest rules, environmental and sustainability expectations, and other supplier conduct standards.	-	X
Standard procurement info	High-level procurement process, vendor onboarding steps, documentation requirements, and general payment terms.	-	X

Category of Records	Types of the Record	Available on Website	Available on Request
Careers and recruitment	Vacancies were advertised; application channels, recruitment process overview, and candidate privacy notices were applicable.	X	X
Corporate social responsibility (CSR)	Community upliftment initiatives, industry training or development programmes, sustainability projects, and partnerships supported by Helukabel in the engineering sectors.	X	X

6.2 Description of the records/subjects of the company which are available in accordance with any other legislation:

Category of Records	Applicable Legislation
Memorandum of Incorporation, CIPC filings, share registers, director appointments and resignations	Companies Act 71 of 2008
Beneficial ownership registers and associated filings	Companies Act 71 of 2008, Companies Regulations 2011 as amended on Beneficial Ownership 2023
Board and committee minutes, conflict-of-interest registers, authority and delegation frameworks	Companies Act 71 of 2008
Employment contracts for factory, warehouse, engineering, logistics, sales, administrative and management staff; time and attendance; overtime; payroll; leave	Basic Conditions of Employment Act 75 of 1997
Wage schedules for warehouse, driver, technician, engineering support, and administrative staff	National Minimum Wage Act 9 of 2018, Basic Conditions of Employment Act 75 of 1997
Disciplinary and grievance files, union correspondence, CCMA and bargaining council case files	Labour Relations Act 66 of 1995
Employment Equity Plan, numerical targets, annual EE reports, consultation and committee minutes	Employment Equity Act 55 of 1998
Recruitment adverts, shortlists, interview outcomes, screening results for technical, engineering, sales, warehouse, and administrative role	Employment Services Act 4 of 2014
Work permits, visas, and related documentation for foreign national employees	Immigration Act 13 of 2002
UIF declarations, contribution statements, benefit claims	Unemployment Insurance Act 63 of 2001

Category of Records	Applicable Legislation
Skills development plans, annual training reports, learnership agreements	Skills Development Act 97 of 1998
Skills levies, SETA registration, mandatory and discretionary grant applications	Skills Development Levies Act 9 of 1999
PAYE records, IRP5 certificates, EMP201 and EMP501 returns, tax directives	Income Tax Act 58 of 1962
VAT returns, input and output schedules, SARS correspondence	Value Added Tax Act 89 of 1991
COIDA registration, Return of Earnings, Letters of Good Standing, incident and injury reports for factory, warehouse and distribution environments	Compensation for Occupational Injuries and Diseases Act 130 of 1993
OHS policies, risk assessments for cable cutting operations, warehouse racking, forklifts, lifting equipment, PPE compliance, safe handling of industrial materials, SHEQ files, incident registers, safety committee minutes	Occupational Health and Safety Act 85 of 1993 and regulations
Public liability, product liability, professional indemnity, goods-in-transit and warehouse insurance schedules, endorsements, incident and claim notifications	Insurance Act 18 of 2017
B BBEE certificate and supporting ownership, skills, enterprise and supplier development records	Broad Based Black Economic Empowerment Act 53 of 2003, Codes of Good Practice
Customer supply agreements, distribution contracts, engineering support agreements, warranty terms, product return/complaint files	Consumer Protection Act 68 of 2008
Promotional competitions and marketing campaigns administered by Helukabel, including competition packs, winner verification records, independent auditor certificates	Regulations on Promotional Competitions under the Consumer Protection Act 68 of 2008
POPIA notices, consent forms, operator agreements, Records of Processing Activities (RoPA), data retention schedules, privacy impact assessments	Protection of Personal Information Act 4 of 2013, Electronic Communications and Transactions Act 25 of 2002
POPIA notices, consent records, operator agreements, records of processing activities, impact assessments, retention schedules	Protection of Personal Information Act 4 of 2013
Security policies, user access records, incident and breach register, notifications to the Regulator and affected data subjects	Protection of Personal Information Act 4 of 2013

Category of Records	Applicable Legislation
PAIA access request register, decisions, fee records and PAIA training evidence	Promotion of Access to Information Act 2 of 2000
Environmental, waste and disposal records for cable offcuts, packaging, industrial materials, recycling and hazardous material handling	National Environmental Management: Waste Act 59 of 2008
Gifts and hospitality registers, conflict-of-interest declarations, third-party risk assessments	Prevention and Combating of Corrupt Activities Act 12 of 2004
Supplier contracts for manufacturing, distribution, warehousing services, IT systems, engineering suppliers, and facility maintenance; procurement policy; due diligence documentation	Preferential Procurement Policy Framework Act 5 of 2000 (where relevant); Consumer Protection Act 68 of 2008; common law of contract
Cyber incident register, digital forensics reports, takedown request records	Cybercrimes Act 19 of 2020
Tender submissions, declarations, bid evaluation outcomes where Helukabel tenders to state bodies	Preferential Procurement Policy Framework Act 5 of 2000; PFMA; MFMA (where applicable)
Records control schedules, archive registers, disposal certificates	National Archives and Records Service of South Africa Act 43 of 1996
Device records for laptops, tablets, handheld scanners, engineering devices, manufacturing equipment software, MDM logs, remote wipe records	Protection of Personal Information Act 4 of 2013, National Road Traffic Act 93 of 1996
Security and privacy due-diligence reports on third-party service providers, cloud systems, ERP and warehouse systems, logistics systems, and engineering software	Protection of Personal Information Act 4 of 2013, Private Security Industry Regulation Act 56 of 2001
Whistleblowing and ethics reports, hotline outcomes and investigation records	Protected Disclosures Act 26 of 2000

- 6.3 The company keeps certain records as required by PAIA and POPIA:
- 6.3.1 PAIA records: PAIA Manual, official guides, submission records, and awareness training materials.
 - 6.3.2 POPIA records: Information Officer registration certificate, data breach records, retention records, and awareness training materials.
 - 6.3.3 Other relevant information may also be made available on request.
- 6.4 The tabulated records may be requested; however, it should be noted that there is no guarantee that the request will be honoured. Each request will be evaluated in terms of PAIA and any other applicable legislation.

7 Request Process

An individual who wishes to place a request must comply with all the procedures laid down in PAIA:

7.1. Initiating the request

7.1.1. Use the prescribed form

- All requests must be made on the prescribed form (**Form 2 – Request for Access to Record [Regulation 7]**) - [Request for Access to Record \[Regulation 7\]](#)
- Additional prescribed forms include:
 - **Form 2 – Request for Correction or Deletion** (section 24 of POPIA). This form is used by a data subject to request the correction of inaccurate, outdated, incomplete, irrelevant, or misleading personal information, and/or the deletion or destruction of personal information that is no longer necessary or unlawfully obtained, in accordance with Section 24(1) of POPIA. It ensures that responsible parties maintain accurate and lawful records of personal data. - [Request for Correction of Deletion of Personal Information or Deletion of Record of Personal Information](#)
 - **Form 3 – Application for a Code of Conduct** (section 61 of POPIA). This form is used by an industry body, profession, or class of entities to apply for the issuance of a Code of Conduct under Section 61(1)(b) of POPIA. It allows industries to self-regulate how personal information is processed within their sector, in line with the conditions for lawful processing. - [Application for the Issue of a Code of Conduct](#)
 - **Form 4 – Request for Consent for Direct Marketing** (section 69 of POPIA). This form enables a responsible party to formally request a data subject's consent to receive direct marketing communications via unsolicited electronic means (e.g., SMS, email), as required under Section 69(2) of POPIA. It ensures that individuals have control over whether and how they are marketed to. - [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 Personal Information**. This form (Information) allows a data subject or complainant to submit a complaint to the Regulator concerning unlawful interference with personal information; or a determination made by an adjudicator under POPIA. It provides an avenue for recourse and investigation in cases of non-compliance with data protection obligations. - [Complaint Regarding Interference with the Protection of Personal Information for the Purpose of Direct Marketing](#)

7.1.2. Requests not submitted on the prescribed form may be rejected.

7.1.3. Assistance in the request process:

- If a requester is illiterate or disabled, they may make the request orally to the IO, who must complete the prescribed form on their behalf and provide them with a copy (section 18(3) of PAIA).
- The IO must provide reasonable assistance to any requester who requires help in completing the form or understanding the procedure.

7.2. Particulars of the Request

7.2.1. The request must provide sufficient detail to enable the IO to identify and process it. This includes:

- A clear description of the record(s) requested.

- Full identity of the requester, with proof of identity where required.
- The preferred form of access (inspection, copy, electronic copy, etc.).
- The requester's contact details (postal, physical, fax or email).
- A statement that the record is required to exercise or protect a right, specifying the nature of that right and explaining why the record is necessary.
- If a request is made on behalf of another person, proof of authorisation must be attached.

7.3. Submission of Requests

- 7.3.1. The completed form, together with proof of payment of the prescribed request fee (if applicable), must be submitted to the Information Officer (IO) at the Company.
- 7.3.2. Requests may be lodged by:
- Hand delivery to the physical address provided in this Manual.
 - Postal delivery to the Company's registered address.
 - Fax; or
 - Email to the address of the IO or DIO.
- 7.3.3. Where applicable, the IO may require a deposit in terms of section 22(2) of PAIA where search and preparation is expected to be time-consuming.

7.4. Fees and Timeframes for Response

- 7.4.1. Requests will be processed and responded to within 30 (thirty) calendar days of receipt.
- 7.4.2. In terms of section 26 of PAIA, the IO may extend this period once, by up to 30 additional days, if:
- The request involves a large number of records;
 - Consultation with third parties is required; or
 - The records are located in another office and cannot reasonably be obtained within 30 days.
- 7.4.3. If an extension is required, the requester will be notified in writing, with reasons for the extension.
- 7.4.4. A request fee may be charged for non-personal requests.
- 7.4.5. If the search and preparation of the record will exceed six (6) hours, the requester may be required to pay a deposit of up to one-third of the estimated fee.
- 7.4.6. Access will only be granted once all required fees have been paid.

7.5. Outcome of Request

- 7.5.1. The IO will notify the requester in writing, using **Form 3 - [Outcome of Request and of Fees Payable \[Regulation 8\]](#)**, of the decision to grant or refuse access.
- 7.5.2. If access is granted, the notice will:
- Specify the form of access; and
 - State the applicable access fees payable before access is given.
- 7.5.3. If access is refused, the notice will set out the grounds for refusal as provided in Chapter 4 of PAIA.

7.6. Appeals and Complaints

- 7.6.1. If access is refused or deemed refused (i.e. no decision within the prescribed period), the requester may:
- Lodge an internal appeal (for public bodies); or

- Refer the matter to the Information Regulator or approach a court of law (for private bodies).

7.6.2. The Regulator can be contacted using the details provided in this Manual.

8 Grounds for Refusal

In terms of Chapter 4 of PAIA, the company may refuse a request for access to records on the following grounds (unless an exception applies):

- 8.1 **Privacy of individuals** - To protect the personal information of a third party (including deceased persons) where disclosure would be unreasonable.
- 8.2 **Commercial interests of third parties** - Records may be refused if they contain:
- Trade secrets;
 - Financial, commercial, scientific, or technical information, where disclosure could cause harm; or
 - Information provided in confidence, where disclosure could disadvantage or prejudice the third party in negotiations or competition.
- 8.3 **Confidentiality agreements** - Information that is protected under a contract or agreement with a third party.
- 8.4 **Safety and security** - Records that could endanger the life, health, or safety of a person, or the protection of property.
- 8.5 **Legal privilege** - Records that would be privileged from disclosure in legal proceedings.
- 8.6 **Commercial interests of the company** - Records may be refused if they contain:
- Trade secrets;
 - Financial, commercial, scientific, or technical information that could harm the company's interests;
 - Information that could prejudice the company in negotiations or competition; or
 - Proprietary computer programs protected by copyright or intellectual property law.
- 8.7 **Research information** - Where disclosure would place ongoing research or a researcher at a serious disadvantage.
- 8.8 **Frivolous or unreasonable requests** - Requests that are clearly frivolous, vexatious, or that would cause an unreasonable burden on company resources.

9 Remedies Should a Request be Refused

- 9.1 If the company does not have an internal appeal procedure in light of a denial of a request, decisions made by the IO is final.
- 9.2 The requestor may in accordance with sections 56(3) (c) and 78 of PAIA, apply to a court for relief within 180 (one-hundred-and-eighty) days of notification of the decision for appropriate relief.

10 Fees

The following fees shall be payable upon request by a requestor:

Details	Fee
Request fee (payable on every request)	R140.00 once-off
Photocopy of an A4 page or part thereof	R2.00 per page
Printed copy of an A4 page or part thereof	R2.00 per page
Hard copy on flash drive (flash drive to be provided by requestor)	R40.00 once-off

Details	Fee
Hard copy on a compact disc (compact disc to be provided by requestor)	R40.00 once-off
Hard copy on a compact disc (compact disc to be provided by the company)	R60.00 once-off
Transcription of visual images per A4 page	As per quotation of service provider
Copy of visual images	As per quotation of service provider
Transcription of an audio record	R24.00 per A4 page
Copy of an audio record on flash drive (flash drive to be provided by requestor)	R40.00 once-off
Copy of an audio on a compact disc (compact disc to be provided by requestor)	R40.00 once-off
Copy of an audio on a compact disc (compact disc to be provided by the company)	R60.00 once-off
Base/starting rate to search for and prepare the record for disclosure	R145.00 per hour for each hour or part thereof, excluding the first hour, reasonably required for such search and preparation (cannot exceed R435.00 per request)
Rate to search for and prepare the record for disclosure	R435.00 per hour for each hour or part thereof, excluding the first hour, reasonably required for such search and preparation (cannot exceed total cost)
Postage, email or any other electronic transfer	Actual expense, if any

11 Processing of Personal Information

- 11.1 The company processes personal information in accordance with the conditions for lawful processing as set out in the Protection of Personal Information Act, 4 of 2013 (“POPIA”). Personal information is processed only for legitimate business purposes, which may include (but are not limited to):
- 11.1.1 Employment-related purposes: Recruitment, administration of employment contracts, payroll, benefits, training, and compliance with labour laws.
 - 11.1.2 Client and supplier management: Entering into and performing contracts, maintaining relationships, processing payments, and responding to queries or complaints.
 - 11.1.3 Legal and compliance obligations: Compliance with statutory and regulatory requirements, record keeping, audits, and reporting.
 - 11.1.4 Security and risk management: Protecting company property, monitoring access, preventing fraud, and ensuring the safety of staff, clients, and visitors.
 - 11.1.5 Marketing and communication: Providing information about products or services, subject to obtaining the necessary consent under POPIA.
- 11.2 The company ensures that personal information is processed lawfully, reasonably, and only for the purposes for which it was collected and takes appropriate steps to protect the confidentiality and integrity of such information.
- 11.3 Description of the categories of data subjects and of the information or categories of information relating thereto:

11.3.1. The company processes personal information relating to various categories of data subjects. The categories of data subjects, and the types of personal information that may be processed in respect of each, include (but are not limited to) the following:

Categories of Data Subjects	Personal Information that may be Processed
Client brand owners and principals	Names, work titles, business contact details, company and VAT registration numbers, order histories, quotations, contracts, technical specifications, delivery addresses, project documentation, quality assurance reports, service correspondence, returns and warranty claims, and related communication.
Retailers, wholesalers, route customers and store contacts	Entity names, registration numbers, VAT numbers, B-BBEE information, bank details, authorized representatives, contracts, rate cards, pricing schedules, safety and compliance certifications (e.g., ISO, SABS), quality control reports, delivery records, performance assessments and related correspondence.
Suppliers and service providers	Entity names, registration and VAT numbers, B BBEE information, tax compliance status, bank details, authorized contact persons, contracts and service level agreements, rate cards, pricing schedules, performance and incident records, order and delivery details for stock, packaging, in store equipment, local logistics and related services, compliance questionnaires, quality and hygiene confirmations, related correspondence.
Contractors, field agencies and professional advisors	Company details, authorized contacts, scope of work, access permits, safety and induction records, work orders, inspection reports, incident reports, security clearances, bank details for payment, confidentiality and processing undertakings, and related correspondence..
Employees	Names, identity numbers, contact details, demographic data, next of kin details, employment contracts, job titles and position history, performance records, qualifications, training and certification records (OHS, ISO, equipment operation, POPIA, PAIA), time and attendance, payroll and tax data, disciplinary records, access control logs, CCTV footage, IT system access records, incident and injury reports, and device allocations.
Factory, production line, warehouse, and logistics staff (including third-party labour)	Names, identity numbers, contact details, work schedules, attendance and clocking information, forklift and machinery operation records, warehouse movement logs, delivery and collection records, PPE compliance records, incident reports, CCTV footage, limited bank or payment details for disbursements.
Job applicants	Names, contact details, CVs, references, qualifications, trade test results, work history, right-to-work records, criminal and credit screening outcomes (where lawful), interview notes, assessment results, and related correspondence.
Transporters, freight and logistics partners	Driver names, identity numbers, license details, vehicle registration numbers, delivery manifests, route and dispatch information, GPS and

	telematics data where applicable, delivery confirmations, incident reports and compliance documents.
Visitors to offices, warehouse, production areas and training centres	Names, visitor card details, identity information, company represented, purpose of visit, access control logs, sign-in/sign-out times, CCTV recordings from offices, manufacturing areas, warehouses, yards and loading bays, and vehicle registration numbers for parking and security control..
Website and online portal users	Names and contact details submitted through Helukabel South Africa's online forms, enquiry content, product requests, device and browser identifiers, IP addresses, timestamps, analytics data, cookie preferences, account identifiers and activity logs on digital platforms used by Helukabel.
Social media users	Profile names, public handles, public posts or messages directed at Helukabel South Africa, reviews, comments, direct message content for service or technical support, and related response records.
Government, municipal and regulatory officials	Names, roles, contact details, inspection records, audit findings, environmental, safety or electrical compliance reports, licenses, permits, and related correspondence.
Community and CSR partners	Organization names, contact persons, contact details, partnership agreements, training records, project documentation, event photographs (with consent where required) and impact or reporting documents.
General public and other stakeholders	Names, contact details, complaint or enquiry content, signatures, supporting documents, whistleblowing or ethics reports, and the minimum additional information required for legal or compliance purposes.

12 The Recipients or Categories of Recipients to whom the Personal Information may be Supplied

12.1 Personal information held by the company may be disseminated to third parties only when lawful and necessary for business, contractual, or regulatory purposes. Categories of personal information and possible recipients include (but are not limited to):

Category of Personal Information	Recipients or Categories of Recipients
Identity numbers, names, business and personal contact details	Government departments and regulatory authorities, law enforcement, auditors, banks and other financial institutions for KYC purposes, clients, industrial customers and distributors, landlords or facility managers for site access or induction purposes, courier and logistics providers for delivery of goods, components or documents, the Information Regulator for statutory submissions.
Qualifications, licenses and professional history	SAQA and professional accreditation bodies, recruitment service providers, background screening providers, client audit teams, industrial customers or production partners where certified personnel are required for manufacturing or installation work.
Credit and payment history	Banks, credit bureaus, payment processors, auditors, external accountants, debt collection agencies, and client finance teams were contractually required for account reconciliation or credit control.

Tax and payroll records	SARS, payroll service providers, pension and provident fund administrators, medical aid and other employee benefit providers, UIF and COID administrators, auditors.
Health and safety information	Occupational health practitioners, safety officers at client or partner premises, medical providers, insurers, Workmen's Compensation authorities, external OHS consultants
Contractual and business information	Clients, distributors, suppliers, industrial partners, auditors, legal advisors, consultants, marketing and technical agencies, manufacturers and subcontractors for service, production or installation delivery.
B BBEE credentials and supplier data	B-BBEE verification agencies, client procurement teams, industrial and retail partners, funders, and corporate or industry portals supporting supplier onboarding or tender processes.
Training and induction records	Industrial clients, training institutions, SETAs for grant claims, auditors and regulators, internal management for compliance with POPIA, PAIA, OHS, ISO, and manufacturing induction programs.
Direct marketing preferences and contact data	Email/SMS service providers, digital marketing agencies, campaign management platforms, suppression list providers for opt-outs and preference updates.
Promotional competition entries and winner data	Auditors, prize fulfilment partners, couriers, client industrial or retail sites for verification, marketing agencies, regulators where required.
CCTV footage, access control logs, visitor registers	Security service providers, landlords and facility management, insurers, law enforcement on lawful request, forensic or investigative service providers, legal advisors.
Fleet, route and incident data for company and contracted vehicles	Telematics and tracking providers, insurers, accident investigators, towing/recovery services, AARTO authorities, external legal advisors, clients for route or delivery reporting where required.
Financial records, invoices, bank details	Banks, external accountants, auditors, payment processors, internal finance teams, suppliers and clients for reconciliation or contractual fulfilment.
Digital and IT records including user IDs, device IDs, logs and backups	Cloud and hosting providers, managed IT service providers, cybersecurity partners, SaaS vendors for ERP, CRM, reporting, production and finance systems, incident response and backup service providers.
Data protection governance records including ROPA, operator agreements and breach logs	Information Regulator, clients and industrial partners where Helukabel acts as operator, group entities involved in governance, legal counsel, cyber and liability insurers, auditors and external consultants.
Procurement and vendor onboarding packs	Due diligence providers, internal procurement, legal, risk, and finance teams, clients, funders and investors performing counterparty verification.
Shareholder, director and beneficial ownership details	CIPC, banks and financial institutions for KYC, auditors, B-BBEE verification agencies, funders, and other parties requiring disclosure under corporate governance, tender, or funding rules.

13 Planned Transborder Flows of Personal Information

- 13.1 The company may, where necessary and lawful, transfer or store personal information outside the Republic of South Africa. This could include, for example, the use of secure cloud-based service providers or international business partners. Where no transborder transfer is required, personal information will continue to be stored and processed within South Africa.
- 13.2 Any cross-border transfer of personal information will only take place in accordance with section 72 of POPIA, which requires that:

- 13.2.1 The recipient country, organisation, or international organisation is subject to a law, binding agreement, or corporate rules that provide an adequate level of protection; or
- 13.2.2 The transfer is necessary for the performance of a contract, with the consent of the data subject, or for another lawful reason recognised by POPIA.

14 Availability of the PAIA Manual at the Company

- 14.1 A copy of the manual is available:
 - 14.1.1 On the website or at any head office for public inspection during normal business hours;
 - 14.1.2 To any person upon request and upon the payment of a reasonable prescribed fee; and
 - 14.1.3 To the Information Regulator upon request.
- 14.2 A fee for a copy of the manual, as contemplated in the Regulations, shall be payable per each A4-size photocopy made.

15 Objection to the Processing of Personal Information by a Data Subject

- 15.1 Any person ("data subject") has the right to object to the processing of their personal information in terms of section 11(3) of POPIA.
- 15.2 An objection must be made on **Form 1 – [Objection to the Processing of Personal Information](#)** or a similar form. This is free of charge and can be sent by hand, post, fax, email, SMS, WhatsApp, or any other convenient method.
- 15.3 When personal information is collected, the company must inform the data subject of their right to object.
- 15.4 If an objection is made by phone, the company must record it electronically and provide a copy or written transcript to the data subject on request, at no cost.

16 Request for Correction/Deletion of Personal Information or Destruction/Deletion of Record of Personal Information

- 16.1 A data subject has the right, under section 24 of POPIA, to request the correction, destruction, or deletion of their personal information at any time and free of charge.
- 16.2 Correction or deletion may be requested if the personal information is:
 - 16.2.1 Inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or unlawfully obtained;
 - or
 - 16.2.2 No longer lawfully permitted to be kept by the company.
- 16.3 Requests must be made using **Form 2 – [Request for Correction of Deletion of Personal Information or Deletion of Record of Personal Information](#)** or a similar form. This can be submitted free of charge by hand, post, fax, email, SMS, WhatsApp, or any other convenient method.
- 16.4 If a request is made by phone, the company must record it electronically and provide a copy or written transcript to the data subject on request, at no cost.
- 16.5 The company must respond within 30 days of receiving the request and notify the data subject in writing of the outcome and any action taken.

17 Applicable Forms**PAIA Forms**

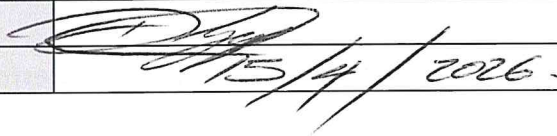
- Form 01:** [Request for a Copy of the Guide from an Information Officer \[Regulation 3\]](#)
Form 02: [Request for Access to Record \[Regulation 7\]](#)
Form 03: [Outcome of Request and of Fees Payable \[Regulation 8\]](#)
Form 05: [Complaint Form \[Regulation 10\]](#)
Form 13: [PAIA Request for Compliance Assessment Form \[Regulation 14\(1\)\]](#)

POPIA Forms

- Form 1:** [Objection to the Processing of Personal Information](#)
Form 2: [Request for Correction of Deletion of Personal Information or Deletion of Record 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 Personal Information for the Purpose of Direct Marketing](#)

18 Updating of the Manual

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

Name of Information Officer	Doug Gunnewegh
Title of the head of the body	Director
Signature	
Date	15/4/2026