

PAIA MANUAL

For

VALUE GROUP PROPRIETARY LIMITED

Registration number: 1997/002203/06

**This manual has been prepared in accordance with Section 51 of the Promotion
of Access to Information Act, No. 2 of 2000.**

(“the ACT” or “PAIA”)

Compilation Date: 26 July 2021
Revision Date: 26 October 2023
Version: 02

1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	“CEO”	Chief Executive Officer
1.2	“CIO”	Chief Information Officer
1.3	“DIO”	Deputy Information Officer;
1.4	“IO”	Information Officer;
1.5	“Minister”	Minister of Justice and Correctional Services;
1.6	“PAIA”	Promotion of Access to Information Act No. 2 of 2000 (as Amended);
1.7	“POPIA”	Protection of Personal Information Act No.4 of 2013;
1.8	“Regulator”	Information Regulator; and
1.9	“Republic”	Republic of South Africa
1.10	“Value”	Value Group Proprietary Limited and its Affiliates.

2. PURPOSE OF THE PAIA MANUAL

This PAIA Manual is useful for the public to –

- 2.1 access all the relevant contact details of the Information Officer and Deputy Information Officer, who will assist the public with the records they intend to access;
- 2.2 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.3 check the categories of records held by Value which are available without a person having to submit a PAIA request;
- 2.4 know the description of the records of Value which are available in accordance with any other legislation;
- 2.5 check the description of records held by Value and the categories in which the records are classed;
- 2.6 know if Value will process personal information and the purpose of processing of personal information;

- 2.7 know if Value has planned to transfer or process personal information outside of the Republic;
- 2.8 know whether Value has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed;
- 2.9 have a sufficient understanding of how to make a request for access to a record of Value, by providing a description of the subjects on which Value holds records and the categories of records held on each subject;
- 2.10 know the fee structure to request records;
- 2.11 know the grounds for refusal to access to records; and
- 2.12 know the procedure if records cannot be found or do not exist.

3. CONTACT DETAILS FOR ACCESS TO RECORDS

3.1 Chief Information Officer

Name: Andre Hogewoning

Mr S.D. Gottschalk, the Chief Executive Officer of Value Group Proprietary Limited, has delegated the power of Head of Organisation for the purposes of the Act to Mr A Hogewoning (Chief Information Officer) and for the purpose of this manual he will be called the Information Officer.

3.2 Deputy Information Officer

Name: Lindsay Terblanche

3.3 Contact Information:

Physical address: 49 Brewery Road, Isando, 1600

Postal address: P O Box 778, Isando, 1600

Telephone no: (011) 570-2000

E-mail address: POPIA@value.co.za

Website: www.value.co.za

4. THE GUIDE AS DESCRIBED IN SECTION 10 OF THE ACT

- 4.1 The Regulator is required by the Act to compile a guide to assist the public to understand the provisions of the Act, its objects and how to make use of the provisions in the Act.
- 4.2 The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("Guide") in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.
- 4.3 The Guide may be obtained –
 - 4.3.1 upon request to the Information Officer/Deputy Information Officer; or
 - 4.3.2 from the website of the Information Regulator: <https://info regulator.org.za/paia-guidelines/>

5. THE LATEST NOTICE REGARDING THE CATEGORIES OF RECORDS OF VALUE, WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS IN TERMS OF THIS ACT IN TERMS OF SECTION 52(2)

Not applicable.

6. RECORDS WHICH ARE AVAILABLE FROM VALUE IN TERMS OF ANY OTHER LEGISLATION

Value holds the following records in accordance with the following legislation:

Administrative Adjudication of Road Traffic Offences Act 46/1998
 Basic Conditions of Employment Act 75/1997
 Broadcasting Act, 4/ 1999
 Broad Based Black Empowerment Act, 53/2003
 Carriage By Air Act, 17/1946
 Carriage of Goods By Sea Act, 1/1986
 Companies Act,71/2008
 Compensation for Occupational Injuries and Transactions Act, 130/1993
 Competition Act, 89/1998
 Consumer Protection act,68/2008
 Cross Border Road Transportation Act, 4/1998
 Customs and Excise Act, 91/1964
 Electronic Communications and Transactions Act, 25/2002
 Employment Equity Act, 55/1998

Fertilizers, Farm Feeds, Agricultural Remedies and Stock Remedies Act, 36/1947
Financial Advisory and Intermediary Services Act, 37/2002
Financial Intelligence Centre Act, 38/2001
Financial Markets Act, 19/ 2012
Financial Sector Regulations Act, 9/ 2017
Financial Services Board Act, 97/1990
Hazardous Substances Act, 15/1973
Immigration Act, 13/2002
Income Tax Act, 58/1962
Insurance Act, 18/ 2017
JSE Listing Requirements
Labour Relations Act, 66/1995
Medicines and Related Substances Act, 101/1965
National Credit Act, 34/2005
National Environmental Management: Air Quality Act, 39/2004
National Environmental Management Act, 107/1998
National Environmental Management: Waste Act, 59/2008
National Water Act, 36/1998
National Regulator for Compulsory Specifications Act, 5/2008
National Road Traffic Act, 93/1996
Occupational Health and Safety Act,85/1993
Pension Funds Act, 2/1956
Petroleum Products Act, 120/1977
Postal Services Act 124/1998
Prevention and Combatting of Corrupt Activities Act, 12/2004
Protection of Constitutional Democracy Against Terrorist and Related Activities Act, 33/2004
Protection of Personal Information Act, 4/2013
Prevention of Organised Crime Act,121/1998
Promotion of Access to Information Act, 2/2000
Protected Disclosures Act,26/2000
Regulation of Interception of Communications and Provisions of Communication Related Information Act, 70/2002
Road Transportation Act, 74/1977
Short Term Insurance Act, 53/1998
Standards Act, 8/2008
Skills Development Act, 97/1998

Skills Development Levies Act, 9/1999
Tax Administration Act, 28/2011
Unemployment Insurance Act, 63/2001
Unemployment Insurance Contributions Act, 2/2002
Value Added Tax Act, 89/1991

7. DESCRIPTION OF THE RECORDS HELD BY VALUE AND THE CATEGORIES IN WHICH THE RECORDS ARE CLASSED

Value has the following records as a matter of standard practice:

7.1 Legal and Company Secretarial

- Company statutory documents
- Registers
- Minutes of meetings
- Statutory returns
- Powers of Attorney
- Share certificates
- Resolutions
- Customer Agreements
- Supplier Agreements
- Litigation documents
- Legal correspondence

7.2 Movable and Immovable property

- Title Deeds
- Certificate of Registration in respect of motor vehicles
- Lease agreements
- Hire agreements
- Hire-purchase agreements
- Credit sale agreements / finance agreements
- Ordinary and conditional sale agreements

7.3 Intellectual Property

- Trademarks
- Patents
- Copyrights
- Designs
- Know-how

- Licensing agreements

7.4 Insurance

- Policies
- Insurance claim files

7.5 Human Resources

- Policies and procedures
- Employee information
- Personnel files
- Agreements
- Forms and applications
- Standard letters and notices
- Workplace and Union agreements and records
- Benefit arrangements, rules and records

7.6 Finance

- Financial statements
- Reports and returns
- Banking details and bank account records
- Debtors/creditors statements and invoices
- Taxation:
 - Income tax files
 - Value Added tax documents
 - Financial statements

7.7 Operations

- Permits, licenses, consents, approvals, authorisations, applications and registrations
- Policies and procedures
- Reports and supporting documents
- Contractor, client and supplier agreements and information
- Security documents

7.8 Information technology

- System documentation and manuals
- Project, disaster recovery and implementation plans
- Licensing documentation

7.9 Administration

- Intranet
- Correspondence with internal and external parties

7.10 Health & Safety

- Policies & Procedures
- Recorded work related incidents

8 PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of processing Personal Information

The purpose of processing Personal Information is documented in Value's Privacy Policy, which is available on Value's website: <https://value.co.za/>, or upon request to the Information Officer/Deputy Information Officer.

8.2 Planned Transborder Flow of Personal Information

Not applicable.

8.3 Security Measures

Adequate security safeguards, measures and controls have been implemented by Value to ensure the confidentiality and integrity of personal information, and to minimise the risk of loss, unauthorised access, disclosure, interference, modification or destruction of personal information.

9 REQUEST PROCEDURE

- 9.1 The requester must make use of the prescribed form attached hereto as Appendix I to make the request for access to a record. The applicable fees (refer to clause 10) are to be paid before access to a record will be permitted.
- 9.2 The prescribed form must be completed in full and addressed to the Information Officer of Value (refer to clause 3). The request must then be submitted to the address or e-mail address of Value.
- 9.3 The requester must identify the right that he or she is seeking to exercise or protect and provide an explanation of why the requested record is required for the exercise or protection of that right.
- 9.4 If a request is being made on behalf of a person, the requester must submit proof of the capacity in which he/she is making the request to the satisfaction of the Information Officer of Value.

- 9.5 If the record which the requester has requested exists, and allowing access to such record does not affect a third party, the requester's request will be processed within 30 (thirty) days.
- 9.6 Once the Information Officer of Value has heard all submissions, he will make a decision on the request and notify the requester in the required form, per Appendix 2.
- 9.7 If access is requested to a record that contains information pertaining to a third party, the Information Officer of Value must attempt to contact the third party and take all reasonable steps to inform the third party of the request, which must be done within 21 (twenty-one) days of receipt of the request.
- 9.8 The third party may within 21 (twenty-one) days thereafter make representations to the Information Officer of Value as to why access should be given or provide reasons why the access should be denied.
- 9.9 The third party must be informed of the decision taken by the Information Officer of Value to grant or decline the request.

10 FEES IN RESPECT OF PRIVATE BODIES

In terms of Regulation 8, value-added tax (VAT) must be added to all fees prescribed in terms of the Regulations. Therefore, the fees reflected below include VAT.

Item	Description	Amount
10.1	Request fee, payable by every requester	R140.00
10.2.	Photocopy or printed black & white copy for every A4 page, or part thereof	R2.00
10.3	Printed copy of A4-size page, or part thereof	R2.00
10.4	For a copy in a computer-readable form on:	
	• a flash drive (provided by the requester)	R40.00
	• a compact disc (CD) if the requester provides the CD to us.	R40.00
	• a compact disc (CD) if we give the CD to the requester.	R60.00
10.5	For a transcription of visual images, for an A4-size page or part thereof	This service will be outsourced.

Item	Description	Amount
		The fee will depend on the quotation from the service provider.
10.6	For a copy of visual images	This service will be outsourced. The fee will depend on the quotation from the service provider.
10.7	For a transcription of an audio record, per A4-size page or part thereof	R24.00
10.8	For a copy of an audio record on a flash drive (provided by the requester)	R40.00
	For a copy of an audio record on compact disc (CD) if the requester provides the CD to us	R40.00
	For a copy of an audio record on compact disc (CD) if we give the CD to the requester	R60.00
10.9	To search for a record that must be disclosed (per hour or part of an hour reasonably required for the search, excluding the first hour)	R145.00
	The search and preparation fee cannot exceed	R435.00
10.10	Deposit: if the search exceeds 6 hours	One-third of the amount per request. It is calculated in terms of items 10.2 to 10.8 above.
10.11	Postage, email or any other electronic transfer	Actual expense, tbc

11 GROUNDS FOR REFUSAL OF ACCESS TO RECORDS

11.1 Section 9 of the Act recognises that the right to access to information cannot be unlimited and should be subject to justifiable limitations, including, but not limited to:

- Limitations aimed at the reasonable protection of privacy;
- Commercial confidentiality; and
- Effective, efficient and good governance;

and in a manner which balances that right with any other rights, including such rights contained in the Bill of Rights in the Constitution.

11.2 The main grounds for Value to refuse a request for information relates to the:

11.2.1 mandatory protection of the privacy of a third party who is a natural person, which would involve the unreasonable disclosure of personal information of that natural person;

11.2.2 mandatory protection of the commercial information of a third party, if the record contains:

11.2.2.1 trade secrets of that third party;

11.2.2.2 financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party;

11.2.2.3 information disclosed in confidence by a third party to Value Group Limited, if the disclosure could put that third party at a disadvantage in negotiations or prejudice that third party in commercial competition.

11.2.3 mandatory protection of confidential information of third parties if it is protected in terms of any agreement;

11.2.4 mandatory protection of the safety of individuals and the protection of property;

11.2.5 mandatory protection of records which would be regarded as privileged in legal proceedings;

11.2.6 the commercial activities of Value, which may include:

11.2.6.1 trade secrets of Value;

11.2.6.2 financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of Value;

11.2.6.3 information which, if disclosed could put Value at a disadvantage in negotiations or commercial competition;

11.2.6.4 a computer program which is owned by Value, and which is protected by copyright.

- 11.2.7 mandatory protection of research information of Value or a third party, if its disclosure would disclose the identity of Value, the researcher or subject matter of the research and would place the research at a serious disadvantage.

Requests for information that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused.

12 RECORDS THAT CANNOT BE FOUND OR DO NOT EXIST

- 12.1 If Value has searched for a record and it is believed that the record does not exist or cannot be found, the requester will be notified by way of an affidavit signed by the Information Officer of Value. This notice is deemed to be a refusal of the request for access to the record. If after notice is given, the record in question is found, the requester must be given access thereto, unless a ground for refusal of access exists.
- 12.2 The Information Officer in terms of section 56 must, within 30 (thirty) days after the request has been received, notify the requester of the decision, whether or not to grant the request.
- 12.3 The initial period of 30 (thirty) days within which the Information Officer of Value must inform the requester of the decision to grant or refuse access to the information requested, may be extended by a further period not exceeding 30 (thirty) days if:
- 12.3.1 the requester consents to the extension in writing;
 - 12.3.2 the request is for a large number of records or requires a search through a large number of records and compliance with the original period of 30 (thirty) days would interfere with Values activities.
- 12.4 Should the initial period of 30 (thirty) days be extended, the requester must be notified of the extension within 30 (thirty) days after the request is received.
- The notice must state:
- 12.4.1 adequate reasons for the extension;
 - 12.4.2 the procedure involved should the requester want to lodge an application to court against the extension; and
 - 12.4.3 the period of extension.
- 12.5 Should the Information Officer of Value Group fail to respond to the requester within the 30 (thirty) day period, such failure will constitute a refusal of the request.

13 COMPLAINTS TO THE INFORMATION REGULATOR

The requester or third party may submit a complaint in writing to the Regulator, within six months of the decision, alleging that the decision was not in compliance with the provisions of legislation. The complaint must be submitted on the Complaint Form indicated in Appendix 3, which can be accessed on the Regulators website or requested from the Information Officer/Deputy Information Officer. The Regulator will investigate the complaint and reach a decision, which may include a decision to investigate, to take no further action or to refer the complaint to the Enforcement Committee. The Regulator may serve an enforcement notice confirming, amending or setting aside the impugned decision, which must be accompanied by reasons.

14 AVAILABILITY OF THE MANUAL

A copy of the Manual is available –

- 14.1 on Value's website: <https://value.co.za/>;
- 14.2 to any person upon request, and upon the payment of a reasonable prescribed fee;
- 14.3 to the Information Regulator upon request.

15 UPDATING OF THE MANUAL

Value's Manual will be updated every three years, or as and when required.

FORM 2

REQUEST FOR ACCESS TO RECORD
[Regulation 7]

NOTE:

1. Proof of identity must be attached by the requester.

2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

TO: The Information Officer

Physical Address**Postal Address**

49 Brewery Road

PO Box 778

Isando

Isando

1601

1600

E-mail address: POPIA@value.co.za

Mark with an "X"

Request is made in my own name

Request is made on behalf of another person.

PERSONAL INFORMATION

Full Names:

Identity Number:

Capacity in which request is made:
(When made on behalf of another person)

Postal Address:

Street Address:

E-mail Address:			
Contact Numbers	Tel.:	Cell.:	Facsimile:
Full names of person on whose behalf request is made: <i>(if applicable)</i>			
Identity Number:			
Postal Address:			
Street Address:			
E-mail Address:			
Contact Numbers	Tel.:	Cell:	Fax:
PARTICULARS OF RECORD REQUESTED			
<i>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. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</i>			
Description of record or relevant part of the record:			
Reference number: <i>(if available)</i>			
Any further particulars of record:			

TYPE OF RECORD	
<i>(Mark the applicable box with an "X")</i>	
Record is in written or printed form	
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	

FORM OF ACCESS	
<i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

MANNER OF ACCESS	
<i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED	
<i>If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.</i>	
Indicate which right is to be exercised or protected:	

Explain why the record requested is required for the exercise or protection of the aforementioned right:

F E E S

- a) A request fee must be paid before the request will be considered.
 b) You will be notified of the amount of the access fee to be paid.
 c) The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.
 d) If you qualify for exemption of the payment of any fee, please state the reason for exemption

Reason:

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication (Please specify)

Signed at _____ this _____ day of _____ 20 _____.

**Signature of Requester / Person on
 whose behalf request is made.**

FOR OFFICIAL USE

Reference number:	
Request received by: (State Rank/Title, Name and Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer

The Form can also be requested from the Information Officer or Deputy Information Officer by emailing: POPIA@value.co.za, or can be accessed on the Information Regulators website at: <https://infoeregulator.org.za/paia-forms/> - Form 02: [Request for Access to Record](#) [Regulation 7]

FORM 3

OUTCOME OF REQUEST AND OF FEES PAYABLE
[Regulation 8]

NOTE:

1. If your request is granted the—

(a) amount of the deposit, (if any), is payable before your request is processed; and

(b) requested record/portion of the record will only be released once proof of full payment is received.

2. Please use the reference number hereunder in all future correspondence.

Reference number: _____

TO: _____

Your request dated _____, refers.

1. You requested:

<p>Personal inspection of information at registered address of public/private body (<i>including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form</i>) is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed below "4. Fees payable with regards to your request".</p>	
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OR

2. You requested:

<p>Printed copies of the information (<i>including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form</i>)</p>	
<p>Written or printed transcription of virtual images (<i>this includes photographs, slides, video recordings, computer-generated images, sketches, etc</i>)</p>	
<p>Transcription of soundtrack (<i>written or printed document</i>)</p>	

Copy of information on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of information on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

3. **To be submitted:**

Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language: <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

Kindly note that your request has been:

Approved

Denied, for the following reasons:

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4. **Fees payable with regards to your request:**

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
For every photocopy of an A4-size page or part thereof	R 2.00		

For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	R 2.00		
For a copy in a computer-readable form on:			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor			
• If provided to the requestor	R60.00		
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size page or part thereof	R24.00		
Copy of an audio record			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor			
• If provided to the requestor	R60.00		
Postage, e-mail or any other electronic transfer:	Actual costs		
Request Fees (payable by every requester)	R140.00		
Access Fees (An access fee is always payable where a request for access to information is granted, except where payment of an access fee is specially excluded in terms of the Act, or an exclusion is determined by the Minister in terms of section 54(8).)			
TOTAL:			

5. **Deposit payable (if search exceeds six hours):** Yes No

Hours of search		Amount of deposit <i>(calculated on one third of total amount per request)</i>	
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The amount must be paid into the following Bank account:

Name of Bank: _____

Name of account holder: _____

Type of account: _____

Account number: _____

Branch Code: _____

Reference Nr: _____

Submit proof of payment to: _____

Signed at _____ this _____ day of _____ 20 _____.

Information Officer

The Form can also be requested from the Information Officer or Deputy Information Officer by emailing: POPIA@value.co.za, or can be accessed on the Information Regulators website at: <https://inforegulator.org.za/paia-forms/> - Form 03: [Outcome of request and of fees payable](#) [Regulation 8]

APPENDIX 3**FORM 5**
COMPLAINT FORM
[Regulation 10]

The Form can be requested from the Information Officer or Deputy Information Officer by emailing: POPIA@value.co.za, or can be accessed on the Information Regulators website at: <https://info regulator.org.za/paia-forms/> - Form 05: [Complaint Form](#) [Regulation 10]