

## PROMOTION OF ACCESS TO INFORMATION MANUAL OF LUMOTECH PROPRIETARY LIMITED IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000 ("PAIA")

### 1. Introduction

This manual has been compiled in accordance with section 51 of the Promotion of Access to Information Act, 2000 ("PAIA"). This manual explains how requesters can submit requests for access to information to Lumotech in terms of PAIA.

### 2. The business

- 2.1. Lumotech manufactures automotive components, our plant and offices are located in Kariega.
- 2.2. Pravika Chetty has been duly appointed as the head by the head of Lumotech, as the Information Officer for Lumotech and is the person to whom requests for access to information must be made in terms of PAIA and in terms of the Protection of Personal Information Act 4 of 2013 ("POPIA").

### 3. Lumotech's Contact details

	Managing Director	Information Officer
Name	Jaco du Plessis	Pravika Chetty
Postal Address	P.O. Box 277 Kariega 6230	P.O. Box 277 Kariega 6230
Physical Address	Fitzpatrick Street Niven Industrial Kariega 6220	Fitzpatrick Street Niven Industrial Kariega 6220
Telephone	+27 41 995 3135	+27 41 995 3002
Email	jacodp@lumotech.co.za	pravika.chetty@lumotech.co.za  popia@lumotech.co.za

#### **4. The Section 10 Guide on how to use PAIA**

- 4.1. From 1 July 2021 onwards, the above guide, as updated by the Information Regulator, will be available at the offices of the Information Regulator and on its website as prescribed by Section 10 of PAIA and in accordance with the Protection of Personal Information Act, 2013 ("POPIA"). From 1 July 2021, please direct any queries regarding this guide to:

**Information Regulator:**

The Research and Documentation Department

33 Hoofd Street, Forum III, 3rd Floor Braampark

P.O. Box 31533, Braamfontein, Johannesburg, 2017

Telephone Number : 010 023 5200

Website : [www.justice.gov.za/inforeg/](http://www.justice.gov.za/inforeg/)

email (complaints) : [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)

email (general enquiries) : [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za)

#### **5. Records that are retained by Lumotech in terms of other legislation**

A requester may request information which is available in terms of the following legislation, provided that the requester complies with the requirements set out in such legislation, this manual and PAIA:

- 5.1. Basic Conditions of Employment Act, 1997;
- 5.2. Broad-Based Black Economic Empowerment Act, 2003;
- 5.3. Companies Act, 2008;
- 5.4. Compensation for Occupational Injuries and Diseases Act, 1993;
- 5.5. Employment Equity Act, 1998;
- 5.6. Income Tax Act, 1962;
- 5.7. Labour Relations Act, 1995;
- 5.8. Occupational Health and Safety Act, 1993;
- 5.9. Promotion of Access to Information Act, 2000;
- 5.10. Protection of Personal Information Act, 2013;
- 5.11. Skills Development Levies Act, 1999;
- 5.12. Unemployment Insurance Act, 2001;
- 5.13. Value Added Tax Act, 1991; and

## 6. Subjects and categories of information held by Lumotech

The subjects and categories of records held by Lumotech are as follows:

<b>Subject</b>	<b>Category</b>
Company records	Constitutional documents (including incorporation documents, the memorandum of incorporation and the shareholders agreement)  Share registers, share certificates, registers and details concerning shareholder meetings and resolutions  Details concerning the identity of directors, directors' meetings, director resolutions  Statutory registers and minute books
Financial records	Budget reports  Bank records  Financial statements  Management accounts  Audit reports  Insurance records  Tax records
Strategic and operational information	Business plan  Budget reports  Minutes of management meetings  Minutes of board meetings  Annual reports
Assets	Asset register  Share certificates  Trade marks schedule  Debtors information  Bank account reconciliation
Liabilities	Loan agreements  General ledger
Information technology	Asset register  Repair and maintenance records  Software programmes  Software licences

	IT policies and procedures Software records
Compliance	B-BBEE compliance records Employment Equity General policies and procedures
Human resources	Staff records Contracts of employment Statutory records Training and skills development records Employment equity records Leave records Beneficiary records HR policies and procedures Disciplinary procedures Salary information Pension fund information Medical aid information
Contractual relationships	Contracts with clients or customers

## 7. Description of personal information processing in terms of POPIA

Lumotech processes personal information as follows:

Subject	Category
Purpose of the processing	Sale of products and services To market products and services to clients or customers To comply with statutory obligations Customer relations purposes To conduct market research surveys Security, administrative and legal purposes To fulfil contractual obligations that we have with clients, customers or third parties
Data subject categories and their personal information	Employees: record of employee life cycle General public: general enquiries and viewing the company website Industry bodies: membership records

	Media: records of media interactions Service providers: record of service provider life cycle
Recipients of personal information	Employee pension funds Financial institutions Industry bodies Law enforcement Medical aid schemes Operators (service providers) Statutory authorities
Expected transnational transfer of personal information	Transfer of personal information to operators Transfer of personal information to other members in the group
Security measures to protect personal information	Physical security measures <ul style="list-style-type: none"> <li>• Access control measures</li> <li>• Internal security measures</li> </ul> Cyber security measures <ul style="list-style-type: none"> <li>• Anti-spam measures</li> <li>• Anti-virus measures</li> <li>• Installing security firewalls</li> <li>• Password control</li> </ul> Training programs on information security Information security audits IT-related company policies

For more information on how we process personal information, please see our privacy policy available at <https://www.lumotech.co.za/resources.aspx>

## 8. The request procedure

### 8.1. Prescribed form

- 8.1.1. A request for information must be made in the prescribed form, a copy of which is attached as Annexe A, must be addressed to the Information Officer and must be submitted with the prescribed fee (see paragraph 8.3).
- 8.1.2. The prescribed request form is available from the Information Officer and from the Information Regulator (if the request is after 1 July 2021), whose contact details are set out in paragraph 4 above.

## 8.2. Manner of request

- 8.2.1. The request must be made to the address, facsimile number or email address of Lumotech set out in paragraph 3 above.
- 8.2.2. The requester must provide enough detail on the request form to enable the Information Officer to identify the record and the requester. The requester should also indicate which form (mode/method) of access is required. The requester should indicate if it requires notice of the decision of the Information Officer in any manner, other than in writing.
- 8.2.3. The requester must identify the right that is sought to be exercised or to be protected and provide an explanation of why the requested record is required for the exercise or protection of that right.
- 8.2.4. If a request is made on behalf of another person, the requester must submit proof of the capacity in which the requester is making the request to the satisfaction of the Information Officer.

## 8.3. Fees

- 8.3.1. A requester who seeks access to a record containing personal information must pay the required request fee.
- 8.3.2. The Information Officer must by notice, require the requester to pay the prescribed fee, if any, before further processing the request.
- 8.3.3. The requester may lodge an application to the high court relating to the payment of the request fee.
- 8.3.4. After the Information Officer has decided on the request, the requester must be notified in the required form.
- 8.3.5. If the request is granted, a further access fee must be paid for the search, reproduction, preparation and for any time, in excess of the prescribed hours, required to search and prepare for the record disclosure.
- 8.3.6. The prescribed fees are available from the Information Officer and from the Information Regulator (if the request is after 1 July 2021), whose contact details are set out in paragraph 3 above.

## 9. Availability of this manual

This manual is available for inspection at:

- 9.1. Lumotech's website, [www.lumotech.co.za](http://www.lumotech.co.za);
- 9.2. Lumotech's principal place of business set out in paragraph 3 above, during normal business hours;
- 9.3. the Information Regulator from 1 July 2021 onwards (see contacts details in paragraph 4.1 above).

# 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 (Finance Director)

**Address:** 2 Fitzpatrick Street  
Cape Road Industrial  
Kariega  
6229

**E-mail address:** popia@lumotech.co.za

**Fax number:** N/A

**Mark with an "X"**

Request is made in my own name       Request is made on behalf of another person

PERSONAL INFORMATION			
<b>Full Names</b>			
<b>Identity Number</b>			
<b>Capacity in which request is made (when made on behalf of another person)</b>			
<b>Postal Address</b>			
<b>Street Address</b>			
<b>E-mail Address</b>			
<b>Contact Numbers</b>	<b>Tel. (B):</b>		<b>Facsimile:</b>
	<b>Cellular:</b>		

<b>Full names of person on whose behalf request is made:</b> <i>(if applicable)</i>			
<b>Identity Number</b>			
<b>Postal Address</b>			
<b>Street Address</b>			
<b>E-mail Address</b>			
<b>Contact Numbers</b>	<b>Tel. (B)</b>		<b>Facsimile</b>
	<b>Cellular</b>		

<b>PARTICULARS OF RECORD REQUESTED</b>	
<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>	
<b>Description of record or relevant part of the record:</b>	
<b>Reference number, if available</b>	
<b>Any further particulars of record</b>	

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

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

<b>MANNER OF ACCESS</b>	
<i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body (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)	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (including transcriptions)	
E-mail of information (including soundtracks if possible)	
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>	

<b>PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED</b>	
<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:	

FEES	
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	
<b>Reason</b>	

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:

<b>Postal address</b>	
<b>Facsimile</b>	
<b>Electronic communication</b> <i>(Please specify)</i>	

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_\_

\_\_\_\_\_  
**Signature of Requester / person on whose behalf request is made**

FOR OFFICIAL USE	
<b>Reference number:</b>	
<b>Request received by:</b> <i>(State Rank, Name &amp; Surname of Information Officer)</i>	
<b>Date received:</b>	
<b>Access fees:</b>	
<b>Deposit (if any):</b>	
<b>Signature of Information Officer</b>	