

PLI ALUMINIUM TECHNOLOGY (PTY) LTD T/A SOLVE

Registration Number: 2017/219682/07

Manual
in terms of
Section 51 of
The Promotion of Access to Personal Information Act 2 of 2000
(the “Act”)

Solve

Date of compilation: March 2024

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1. Solve Introduction

Proud manufacturer of Mundo, Badger and Weaver aluminium and fiberglass ladders, access, extruded profiles and work-at-height products.

2. Purpose of this Manual and the Act

The purpose of PAIA is to promote the right of access to information, to foster a culture of transparency and accountability in South Africa, and to encourage an open democracy where individuals from all walks of life are empowered to engage with government and participate in decisions which affect their lives.

This Solve Manual outlines the type of records and personal information that Solve holds and explains how to submit requests for access to these records in terms of the Promotion of Access to Personal Information Act. It further explains how personal information in the possession of Solve and under its control is safeguarded and protected.

The 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.

Requests in terms of the ACT shall be made in accordance with the prescribed procedures, at the rates provided. The forms and tariff are dealt with in paragraphs 6 and 7 of the Act and in sections 14 and 15 of this Manual.

3. Availability of this Manual

Requesters are referred to the Guide in terms of Section 10 of the Act which has been compiled by the South African Human Rights Commission, which will contain information for the purposes of exercising Constitutional Rights.

4. Availability of Guides

Guides to the PAIA and POPIA (Protection of Personal Information Act) may be obtained, and queries may be directed to:

POPI Act
Information Regulator (South Africa)
P.O Box 31533
Braamfontein
Johannesburg,
2017
JD House
27 Stiemens Street
Braamfontein
Johannesburg
2001
Website: https://inforegulator.org.za/
Email: enquiries@inforegulator.org.za

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5. Company Contact DetailsDuly Authorised persons

Directors: Dewald Nel
Nikhail Pillay
Francois Roos
Jansen Muller

Responsible Party (Head of the private body): PLI Aluminium Technology (Pty) Ltd t/a Solve

Information Officer: Pieter Fourie
 Contact Number: 010 110 9180
 Email: pieter.fourie@solve.africa

Deputy Information Officer: Ian Malcolm Fowler
 Contact Number: 010 110 9180
 Email: ian.fowler@solve.africa

Postal Address 22 Dolomiet Road
Pendale 1961

Physical Address 22 Dolomiet Road
Pendale
Randvaal
Meyerton

Telephone Number 010 110 9180
 Email ian.fowler@solve.africa

6. Applicable Legislation

Administration Of Estates Act 66 Of 1965	
Administrative Adjudication of Road Traffic Offences Act 46 of 1998 as amended	
Arbitration Act 42 Of 1965	
Auditing Profession Act 26 Of 2005	
Basic Conditions Of Employment Act 75.1997	
Broad-Based Black Economic Empowerment Act 75 of 1997	
Business Act 71 of 1991	
Close Corporations Act 69 Of 1984	
Collective Investment Schemes Control Act 45 Of 2002	
Companies Act 71 Of 2008	
Compensation Of Occupational Injuries & Diseases Act 130 of 1993	
Competition Act 71 of 2008	
Consumer Protection Act 68 of 2008	
Copyright Act 98 of 1978	
Customs and Excise Act 91 of 1964	
Electronic Communications Act 36 of 2005	
Electronic Communications and Transactions Act 25 of 2002	
Employment Equity Act, No. 55 Of 1998	
Films & Productions Act 65 of 1996	

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Financial Advisory and Intermediary Services Act 37 of 2002	
Financial Institutions (Protection of Funds) Act 28 of 2001	
Financial Intelligence Centre Act 38 of 2001	
Friendly Societies Act 25 of 1956	
Identification Act 68 of 1997	
Income Tax Act 58 of 1962	
Insolvency Act 24 of 1936	
Insurance Act 18 of 2017	
Intellectual Property Laws Amendment Act 38 of 1997	
Labour Relations Act 66 of 1995	
Long-term Insurance Act 52 of 1998	
Medical Schemes Act 131 of 1998	
National Credit Act 34 of 2005	
National Road Traffic Act 93 of 1996	
National Qualifications Framework Act 67 of 2008	
Occupational Health and Safety Act 85 of 1993	
Patents Act 57 of 1978	
Pension Funds Act 24 of 1956	
Prescription Act 68 of 1969	
Prevention of Organised Crime Act 121 of 1998	
Prevention and Combating of Corrupt Activities Act 12 of 2004	
Private Security Industry Regulation Act 54 of 2001	
Promotion of Access to Information Act 2 of 2000	
Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000	
Protection of Constitutional Democracy against Terrorist and related Activities Act 33 of 2004	
Protection of Personal Information Act 4 of 2013	
Qualifications Act 58 of 1995	
Regulation of Interception of Communications and Provision of Communication-related Information Act 122 of 2002	
Revenue Laws Second Amendment Act 61 of 2008	
Short-term Insurance Act 53 of 1998	
Skills Development Act 97 of 1998	
Tax Administration Act 28 of 2011	
Trademarks Act 194 of 1993	
Unemployment Insurance Contributions Act 63 of 2001	
Value-Added Tax Act 89 of 1991	

7. Schedule of Records and Availability

Category	Record	Availability	Applicable Legislation
Public Affairs	Public Product Information	Freely Available	
	Launches and Events Records	PAIA Request	
	Journalist Records	PAIA Request	Films & Productions Act 65 of 1996
	Public Corporate Records	Freely Available	Companies Act 71 of 2008
	Media Releases	Freely Available	Electronic Communications Act 36 of 2005 Films & Productions Act 65 of 1996

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Public Affairs	Social Media Posts	Freely Available	Electronic Communications Act 36 of 2005
	Published Newsletters	Freely Available	Electronic Communications Act 36 of 2005
	Magazine Articles	Freely Available	Films & Productions Act 65 of 1996
Regulatory & Administrative	Permits, Licenses or Authorities	Freely Available	National Road Traffic Act 93 of 1996 Administrative Adjudication of Road Traffic Offences Act 46 of 1998 as amended Occupational Health & Safety Act 85 of 1993
	Conflict of Interest Management Policy	Freely Available	Financial Advisory & Intermediary Services Act 37 of 2002 – Part 2
	Complaints Policy	Freely Available	Financial Advisory & Intermediary Services Act 37 of 2002 – Part 11
	FICA Internal Rules	PAIA Request	Financial Intelligence Centre Act 38 of 2001
	Health & Safety Plan	PAIA Request	Occupational Health & Safety Act 85 of 1993
	Documents of Incorporation	PAIA Request	Companies Act 71 of 2008
	Memorandum of Incorporation	PAIA Request	Companies Act 71 of 2008 – Schedule 5, Section 4
	Minutes of Board, Directors Meetings, and Shareholder Meetings	PAIA Request	Companies Act 71 of 2008 – Part F, Section 39
	Register of Members	PAIA Request	Companies Act 71 of 2008 – Chapter 3
	Register of Board of Directors and Director's shareholdings	PAIA Request	Companies Act 71 of 2008 – Part F, Section 39
	Proxy Forms	PAIA Request	Companies Act 71 of 2008 – Part C, Section 51
	Share Certificates	PAIA Request	Companies Act 71 of 2008 – Part C, Section 61 & 66
	Internal correspondence (e-mails/memos)	PAIA Request	
	Insurance Policies held by organisation	PAIA Request	Insurance Act 18 of 2017 Short Term Insurance Act 53 of 1998
Human Resources	Employment Applications	PAIA Request	
	Recruitment Records	PAIA Request	
	Employment Contracts	PAIA Request	Basic Conditions of Employment Act 75 of 1997 Labour Relations Act 66 of 1995
	Personal Information of Employees	PAIA Request	Basic Conditions of Employment Act 75 of 1997 Labour Relations Act 66 of 1995
	Employment Equity Plan	PAIA Request	Employment Equity Act 55 of 1998
	Medical Aid Records	PAIA Request	Basic Conditions of Employment Act 75 of 1997 Labour Relations Act 66 of 1995
	Medical Records	PAIA Request	Basic Conditions of Employment Act 75 of 1997 Labour Relations Act 66 of 1995

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Human Resources	Pension Fund Records	PAIA Request	Pension Funds Act 24 of 1956
	Employee Disability Insurance Records	PAIA Request	Compensation of Occupational Injuries & Diseases Act 130 of 1993
	Disciplinary Records	PAIA Request	Basic Conditions of Employment Act 75 of 1997 Labour Relations Act 66 of 1995
	Company Guidelines, Policies and Procedures	PAIA Request	Basic Conditions of Employment Act 75 of 1997 Labour Relations Act 66 of 1995
	Performance Management Records	PAIA Request	Basic Conditions of Employment Act 75 of 1997 Labour Relations Act 66 of 1995
	Salary & Payroll Records	PAIA Request	Basic Conditions of Employment Act 75 of 1997 Labour Relations Act 66 of 1995
	Employee Benefit Records	PAIA Request	Unemployment Insurance Contributions Act 63 of 2001
	Union Agreements and Records	PAIA Request	<i>Specific to SD</i>
	PAYE Records	PAIA Request	Income Tax Act 58 of 1962
	Seta Records	PAIA Request	Skills Development Act 97 of 1998 Qualifications Act 58 of 1995 National Qualifications Framework Act 67 of 2008
	Disciplinary Code	PAIA Request	Basic Conditions of Employment Act 75 of 1997 Labour Relations Act 66 of 1995
	Leave Records	PAIA Request	Basic Conditions of Employment Act 75 of 1997 Labour Relations Act 66 of 1995
	Training Records	PAIA Request	Skills Development Act 97 of 1998 Qualifications Act 58 of 1995 National Qualifications Framework Act 67 of 2008
	Training Manual	PAIA Request	Skills Development Act 97 of 1998 Qualifications Act 58 of 1995 National Qualifications Framework Act 67 of 2008
Inpatriate and Expatriate Records	PAIA Request	Tax Administration Act 28 of 2011	
Financial	Financial Statements	PAIA Request	Financial Advisory & Intermediary Services Act 37 of 2002 Companies Act 71 of 2008 – Part C, Section 125
	Financial and Tax Records	PAIA Request	Financial Advisory & Intermediary Services Act 37 of 2002 Tax Administration Act 28 of 2011 Income Tax Act 58 of 1962 Value Added Tax Act 89 of 1991

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Financial	Asset Register	PAIA Request	Companies Act 71 of 2008 – Part C, Section 25 Income Tax Act 58 of 1962
	Supplier Records	PAIA Request	Consumer Protection Act 68 of 2008 – Part C, Section 22 Competition Act 71 of 2008 – Part D, Section 40
	Management Accounts and Reports	PAIA Request	Financial Advisory & Intermediary Services Act 37 of 2002 National Credit Act 34 of 2005
	Vouchers, Cash Books and Ledgers	PAIA Request	Financial Advisory & Intermediary Services Act 37 of 2002 National Credit Act 34 of 2005
	Banking Records and Statements	PAIA Request	Banks Act 94 of 1994
	Electronic Banking Records	PAIA Request	Banks Act 94 of 1994 Electronic Communications and Transactions Act 25 of 2002
Legal Services and Compliance Division	General Contract Documentation	PAIA Request	
	Intellectual Property Records	PAIA Request	Intellectual Property Laws Amendment Act 25 of 2013
	Immovable Property Records	PAIA Request	Immovable Property Act 94 of 1965
	Statutory Records	PAIA Request	Companies Act 71 of 2008 – Part C, Section 22
Marketing	Market Information	PAIA Request	Consumer Protection Act 68 of 2008
	Product Brochures	PAIA Request	
	Advertisements	PAIA Request	
	Field Records	PAIA Request	
	Performance Records	PAIA Request	
	Product / Service Sales Records	PAIA Request	Consumer Protection Act 68 of 2008 – Chapter 2 Protection of Personal Information Act 4 of 2013 – Chapter 8
	Marketing Strategies	PAIA Request	
Production / Logistics Department	Production Records	PAIA Request	Companies Act 71 of 2008
	Engineering Records	PAIA Request	
	Apprenticeship Records	PAIA Request	
	Quality Records	PAIA Request	
IT Department	Processing, Testing & Developmental Records	PAIA Request	
Facilities Management Department (Security)	Physical Security Records (Visitors, Suppliers, Customers/Clients, Employees)	PAIA Request	Protection of Personal Information Act 4 of 2013
	Electronic Access and Identity Management Records (Employees, Contractors, Vendors) Includes biometric information	PAIA Request	Occupational Health & Safety Act 85 of 1993 Private Security Industry Regulation Act 54 of 2001
	Time and Attendance Records	PAIA Request	

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Client/Customer	Customer Records		Consumer Protection Act 68 of 2008 – Part C, Section 22 Competition Act 71 of 2008 – Part D, Section 40
	Credit Application Information		
	Customer / Client Database		Protection of Personal Information Act 4 of 2013
	Customer / Client Agreements		Protection of Personal Information Act 4 of 2013
	Customer / Client Files		Protection of Personal Information Act 4 of 2013
	Customer / Client Instructions		Electronic Communications and Transactions Act 25 of 2002
	Customer / Client Correspondence		Electronic Communications Act 36 of 2005
Third Party	Rental agreements		Financial Intelligence Centre Act 38 of 2001
	Supplier Contracts		Consumer Protection Act 68 of 2008 – Part C, Section 22 Competition Act 71 of 2008 – Part D, Section 40
	Non-disclosure agreements		Protection of Personal Information Act 4 of 2013
	Letters of Intent		Protection of Personal Information Act 4 of 2013
Risk Control	Complaints and Investigation Records		
Mail	Mail Register		

Based on the Stylo Investments (Pty) Ltd model

8. Processing of Personal Information

- 8.1. Solve values and understands the importance of privacy and protection of personal information and will therefore only process personal information in accordance with POPIA. The relevant Solve privacy policies relating to the collection, processing, safeguarding, and sharing will be applied to any personal information processed by Solve.
- 8.2. Solve processes personal information for various specific purposes including, but not limited to, the following:
- 8.2.1. For employment purposes.
 - 8.2.2. For apprenticeship/internship purposes.
 - 8.2.3. For recruitment purposes.
 - 8.2.4. To provide products and/or services to data subjects.
 - 8.2.5. To obtain relevant and specific products and technology from suppliers and vendors to enable Solve to provide products and/or services to data subjects.
 - 8.2.6. To establish an improvement plan for the quality of products and/or services provided by Solve.
 - 8.2.7. To identify data subjects when they contact Solve.
 - 8.2.8. To implement and maintain customer/client records.
 - 8.2.9. To perform customer/client related analysis to establish specific customer/client profiles.
 - 8.2.10. For administrative, financial, and contractual purposes – including tax purposes.
 - 8.2.11. For legal and legislative purposes.
 - 8.2.12. For health & safety purposes.
 - 8.2.13. To enable the proper facilitation and security of Solve by monitoring access to the premises and by securing the premises.

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- 8.2.14. To perform all business functions relating to suppliers and business partners.
 8.2.15. To establish a detection framework for preventing fraud and money laundering.
 8.2.16. To enable Solve to recover any debts.
 8.2.17. For travel purposes.
 8.2.18. To perform reasonable and specific market related research to identify a specific need for products and/or services from our data subjects.

9. Data Subject Categories

9.1. The following table indicates the specific categories of data subjects of which Solve processes personal information:

Category	Personal Information processed
Business Partner Information	Business partner personal information
	Business partner performance information
	Business partner financial status/record information
	Business partner employee information
Employees	Employee personal Information
	Employment history information
	Employee health status – medical history
	Employee financial history and current financial status – Salary information
Employees	Employee benefit information – Provident & Pension Fund information
	Payroll information – leave, bonus pay etc
	Employment contract information
	Employee performance/satisfaction reports and information
	Employee training and awareness sessions records
	Attendance register records – including all clocking procedures
	Health & Safety records
	Remote Access records
	Physical Access records
	Surveillance records
Inpatriate and Expatriate	Inpatriate and expatriate personal information
Recruitment and Applications records	Curriculum Vitae and application forms
	Relevant background check reports
	Criminal history report
	Credit score and financial status reports (where applicable)
Customers/Client & Potential customers/clients	Customer personal information
	Customer Service Level Agreements
	Customer warranties
	Customer specific location information
	Customer financial records – account numbers for debit order purposes
	Customer personal information – customer data subject personal information for the purpose of processing as a third party
Suppliers/Vendors	Supplier personal information
	Supplier financial records – account numbers for payment purposes
	Supplier representative information
Visitors	Visitor personal information
	Security access information – physical
	Security access information – electronic access
	Surveillance records/footage

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10. Recipient Categories

- 10.1. The following is a list of recipients that Solve shares personal information of data subjects with for any of the purposes outlined in Section 7 and 8:
 - 10.1.1. Any other Solve branch in South Africa and in other countries.
 - 10.1.2. Carefully selected business partners associated with Solve.
 - 10.1.3. Suppliers – where applicable to provide a service related to the personal information of Solve’s data subjects.
 - 10.1.4. Service providers and representatives/agents that provide a service on Solve’s behalf.
 - 10.1.5. Any third party with who Solve has signed an agreement to process personal information on Solve’s behalf.
- 10.2. Solve will not share personal information of data subjects with any third party’s or unauthorised persons, except under the following conditions:
 - 10.2.1. Where Solve is legally obliged to provide such personal information.
 - 10.2.2. Where Solve is legally required to do so for existing or future legal proceedings.
 - 10.2.3. Where Solve is involved in the prevention of fraud, bribery, corruption, or money laundering.
 - 10.2.4. Where Solve is selling one or more of their businesses to a person to whom Solve may legally transfer Solve’s rights under any customer agreement signed with customers.
 - 10.2.5. The sharing of such personal information is required to provide or maintain any information, products and/or service to data subjects.
 - 10.2.6. Where a third party provides a service in accordance with a signed agreement to process such personal information on Solve’s behalf.
 - 10.2.7. Where the sharing of such personal information is required to assist Solve in improving the quality of its products and/or services.
- 10.3. Solve undertakes to send its data subjects proper notification in the event that it is obliged by law to share personal information pertaining to specific data subjects.
- 10.4. Solve further undertakes to only disclose personal information of data subject to the government when it is legally required by law to do so.
- 10.5. All Solve employees (including vendors and contractors with access to Solve information and systems) have the responsibility to adhere to all privacy and confidentiality policies published by Solve and to attend scheduled personal information privacy awareness sessions.

11. Security safeguarding measures to protect personal information

- 11.1. Solve has implemented reasonable, appropriate technical and organisational measures to protect the personal information of its data subjects.
- 11.2. Solve has entered into the relevant agreements with third parties and has signed an Information Processing Agreement with all its third parties to ensure that all third parties processing personal information on behalf of Solve adheres to the reasonable, appropriate technical and organisational measures.
- 11.3. Solve regularly verifies the technical and organisational measures implemented and continually updates these measures to enable and enhance proper risk management of personal information in its possession and under its control.

12. Information transfer – Cross-border flow of personal information

- 12.1. Solve undertakes to only transfer personal information across South African borders where relevant business transactions and/or situations require cross-border processing and/or where the relevant data subject has given its consent to the cross-border transfer of the personal information.
- 12.2. Solve further undertakes to ensure that the personal information is adequately protected when being transferred cross-border.
- 12.3. Solve will ensure that it enters into a written, binding agreement with all third parties to ensure that an adequate and proper level of protection is provided and that the conditions for lawful processing of personal information, in terms of POPIA, is upheld.

13. Personal information received from a third party

- 13.1. Solve requires written consent from all data subjects of which it receives personal information via a third party and confirmation that the data subjects do not object to Solve processing their personal information.
- 13.2. Solve requires that all data subjects of which it receives personal information via a third party to be aware of this Solve PAIA Manual and to take note of all the Solve policies relating to the processing of personal information.

14. Form of Request

- 14.1. To facilitate the processing of your request, kindly:
 - 14.1.1. Consult the Solve Data Request Procedure and complete the required form Annexed to the procedure.
 - 14.1.2. Address your request to the Solve Information Officer.
 - 14.1.3. Provide sufficient details to enable Solve to identify:
 - a. The record(s) requested.
 - b. The requester (and if an agent is lodging the request, proof of capacity).
 - c. The form of access required.
 - d. The South African postal address or email address of the requester.
 - e. If the requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof.
 - f. 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.

15. Access to prescribed fees

- 15.1. The following applies to requests (other than personal requests):
 - 15.1.1. A requester is required to pay the prescribed fees (R140.00) before a request will be processed.
 - 15.1.2. If the preparation of the record requested requires more than the prescribed hours (six), a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted).
 - 15.1.3. A requester may lodge an application with a court against the tender/payment of the request fee and/or deposit.
 - 15.1.4. Records may be withheld until the fees have been paid.
 - 15.1.5. The fee structure is also available on the website of the INFORMATION REGULATOR <https://inforegulator.org.za/>

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16. Access to prescribed forms and fee schedule

- 16.1. A hard copy of the prescribed forms and fee schedule may be requested from the Solve Information Officer or Deputy Information Officer. (See contact details in Section 5 of this Manual).

17. Appeal Process

- 17.1. Solve does not have a dedicated internal appeal procedure regarding any requests in terms of PAIA or POPIA.
- 17.2. Therefore, the decision regarding any requests in terms of this Manual, PAIA, and POPIA made by the Solve Information Officer or Deputy Information Officer, is final.
- 17.3. Any requester is entitled to apply to the Information Regulator for relief in the case of a request being denied by Solve.