We respect your right of access to information. This document will help you exercise that right as required by section 51 of the Promotion to Access of Information Act 2 of 2000 (PAIA).

Callouts like this are a summary of our manual and contain the most important and relevant points for you. They are here to help you understand it, but please read the full manual.

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Introduction

We are Permoseal (Pty) Ltd, a leading manufacturer and supplier of a wide range of adhesives, sealants and DIY products for general and specialised applications in the consumer, construction and industrial markets. This is our ‘Access to Information Manual’. Its purpose is to help you access our information and any other information that we have. PAIA requires us to make it available to you so that you:

- know what types of information we have; and
- can request access to it.

This manual exists to tell you what information we have and help you get access to it.

Our details

Our details are as follows:

- **Company name:** Permoseal (Pty) Ltd
- **Registration number:** 2000/011475/07
- **Postal address:** Box 37008, Chempet, 7442
- **Physical address:** Beverley Close, Montague Gardens, Cape Town, 7441
- **Phone number:** 021 555 7400
- **Information officer:** Robin Jacobs
- **Information and deputy information officer email:** paia@alcolin.co.za
- **Deputy information officers:** Alison Muller, Lizmari Eitner, and Vanessa Downing
- **Website:** [https://www.alcolin.com/](https://www.alcolin.com/)

Further guidance

If you would like further guidance on how you can get access to information under PAIA, you may contact the Information Regulator to find out more information about PAIA. The Information Regulator is required to compile a guide in each official language of South Africa on how to exercise any right under PAIA. The current guide compiled by the South African Human Rights Commission is available here: [https://www.sahrc.org.za/home/21/files/SAHRC%20PAIA%20Section%2010%20Guide%202020%20FINAL%20WEB.pdf](https://www.sahrc.org.za/home/21/files/SAHRC%20PAIA%20Section%2010%20Guide%202020%20FINAL%20WEB.pdf). In terms of the Section 110 of the Protection of Personal Information Act 4 of 2013 the functions of the Human Rights Commission have transferred to the Information Regulator. Their contact details are as follows:

- **Postal address:** P.O Box 3153, Braamfontein, Johannesburg, 2017
- **Physical address:** JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
- **Phone number:** 010 023 5200
- **General e-mail:** infereg@justice.gov.za
- **Complaints email:** complaints.IR@justice.gov.za


Records we hold

We hold the following subjects and categories of records:

- **Company records:**
• Business records;
• Financial records;
• Insurance records;
• Income tax records;
• Personnel records;
• Policies and directives;
• Agreements or contracts;
• Regulatory documents;
• Published information;
• Customer information; and
• Reference materials.

Please note that records that are ‘not automatically available,’ must be requested using the process outlined in the ‘How to request access’ section of this manual.

<table>
<thead>
<tr>
<th>We hold various subjects and categories of records in electronic or physical form that are available automatically or in other ways.</th>
</tr>
</thead>
</table>

**Company records**

Company records are all our records related to the incorporation and administration of our company. Some of them are available from the Companies and Intellectual Property Commission (CIPC).

| Memorandum of incorporation | Automatically available from CIPC |
| Directors’ names | Automatically available from CIPC |
| Documents of incorporation | Automatically available from CIPC |
| Minutes of board of directors meetings | Not automatically available |
| Written resolutions | Not automatically available |
| Records relating to appointment of directors, auditor, secretary, public officer, or other officers | Not automatically available |
| Share register and other statutory registers | Not automatically available |
| Other statutory records | Not automatically available |

**Company records include our memorandum of incorporation and directors’ names.**

**Business records**

Business records include any documents that have economic value to the business.

| Operational records | Not automatically available |
| Databases | Not automatically available |
| Published works | Not automatically available |
| Internal correspondence | Not automatically available |
| Product records | Not automatically available |
| Production records | Not automatically available |
| Stock records | Not automatically available |
| Supplier records | Not automatically available |
### Financial records

Financial records are all our records related to our finances.

<table>
<thead>
<tr>
<th>Description</th>
<th>Availability</th>
</tr>
</thead>
<tbody>
<tr>
<td>Financial statements</td>
<td>Not automatically available (NDA required)</td>
</tr>
<tr>
<td>Tax returns</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Other documents relating to taxation of the company</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Accounting records</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Management accounts</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Auditor reports</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Banking records</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Banking details</td>
<td>Automatically available on request</td>
</tr>
<tr>
<td>Bank statements</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Electronic banking records</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Paid cheques</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Asset register</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Purchase order, quotes and invoices</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Financial agreements</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Transaction records</td>
<td>Not automatically available</td>
</tr>
</tbody>
</table>

Financial records include our financial statements and banking details.

### Insurance records

Insurance records are all our records related to our insurable assets.

<table>
<thead>
<tr>
<th>Description</th>
<th>Availability</th>
</tr>
</thead>
<tbody>
<tr>
<td>Insurance policies held by the company</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Records of insurance claims</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Register of all immovable property owned by the company</td>
<td>Not automatically available</td>
</tr>
</tbody>
</table>

### Income tax records

Income tax records are all our records related to our income tax obligations.

<table>
<thead>
<tr>
<th>Description</th>
<th>Availability</th>
</tr>
</thead>
<tbody>
<tr>
<td>PAYE Records</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Corporate tax records</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Customs tax</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Documents issued to employees for income tax purposes</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Records of payments made to SARS on behalf of employees</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>VAT records</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Regional Services Levies</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Skills Development Levies</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>UIF</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Workmen’s Compensation</td>
<td>Not automatically available</td>
</tr>
</tbody>
</table>
Personnel records

Personnel records are all our records about anyone who works for us, provides services to us, or provides services on our behalf and who receives or is entitled to receive remuneration, including our employees, contractors, and other personnel.

<table>
<thead>
<tr>
<th>List of employees</th>
<th>Not automatically available</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employee personal information</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Employee employment contracts</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Employment applications and appointment letters</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Employment policies and procedures</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Employment Equity Plan</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Health and safety records</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Medical aid records</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Pension and provident fund records</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Salaries of employees</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Attendance registers</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Leave records</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Internal evaluations and performance records</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Disciplinary records</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Training records</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Operating manuals</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Personal records provided by personnel</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Other statutory records</td>
<td>Not automatically available</td>
</tr>
<tr>
<td>Related correspondence</td>
<td>Not automatically available</td>
</tr>
</tbody>
</table>

Personnel records include records about our employees and contractors.

Policies and directives

Policies and directives include both internal and external documents.

| Internal relating to employees and the company | Not automatically available |
| External relating to clients and other third parties | Not automatically available |
| Information technology systems and documents | Not automatically available |

Agreements or contracts

Agreements or contracts include the documents themselves and all related documents.

| Standard Agreements | Not automatically available |
| Contracts concluded with customers | Not automatically available |
| NDAs | Not automatically available |
| Letters of Intent, MOUs | Not automatically available |
| Third party contracts (such as agency agreements, licensing and distribution agreements, JV agreements, etc.) | Not automatically available |
| Office management contracts | Not automatically available |
| Bond agreements | Not automatically available |
Rental agreements       Not automatically available
Supplier or service contracts       Not automatically available

Regulatory documents
Regulatory documents include any documents required to comply with any laws.

Permits       Not automatically available
Licences       Not automatically available
Authorities       Not automatically available

Published information
Published information includes any document that we prepare and produce.

Brochures       Automatically available on request
External newsletters and circulars       Automatically available
Information available on the website       Automatically available
Internal newsletters and circulars       Not automatically available
Information on the company published by third parties       Not automatically available

Customer information
Customer information includes any information about anyone that we provide goods or services to, including our customers, leads, or prospects.

Customer details       Not automatically available
Contact details of individuals within customers       Not automatically available
Communications with customers       Not automatically available
Sales records       Not automatically available
Transactional information       Not automatically available
Marketing records       Not automatically available

Reference materials
Reference materials include any sources of information that we contribute to.

Books       Not automatically available
Newsletters and journals articles       Not automatically available
Magazines       Not automatically available
Newspaper articles       Not automatically available

Information we hold to comply with the law
We hold records for the purposes of PAIA in terms of the following main laws, among others:

• Basic Conditions of Employment Act 75 of 1997;
• Broad Based Black Economic Empowerment Act 53 of 2003;
• Companies Act 61 of 1973;
• Companies Act 71 of 2008;
• Compensation for Occupational Injuries and Disease Act 130 of 1993;
How to request access

We have authorised and designated our information officer to deal with all matters relating to PAIA in order to comply with our obligations in terms of PAIA. To request access to a record, please complete Form C which is available from the Information Regulator website at https://www.justice.gov.za/forms/paia/J752_paia_Form%20C.pdf

Please submit the completed form to our information officer together with the relevant request fee (details here: http://www.sahrc.org.za/home/21/files/PAIA%20Notice%20on%20fees.pdf) at our information officer’s email address, or our physical address, in terms of our details provided above. Please ensure that the completed form:

- has enough information for the information officer to identify you, the requested records, and which form of access you require;
- specifies your email address, postal address, or fax number;
- describes the right that you seek to exercise or protect;
- explains why you need the requested record to exercise or protect that right;
- provides any other way you would like to be informed of our decision other than in writing; and
• provides proof of the capacity in which you are making the request if you are making it on behalf of someone else (we will decide whether this proof is satisfactory).

If you do not use the standard form we may:

• reject the request due to lack of procedural compliance;
• refuse it if you do not provide sufficient information; or
• delay it.

You may request information by completing a request for access form and submitting it to our information officer together with a request fee.

Grounds for refusal

We may have to refuse you access to certain records in terms of PAIA to protect:

• someone else’s privacy;
• another company’s commercial information;
• someone else’s confidential information;
• the safety of individuals and property;
• records privileged from production in legal proceedings; or
• research information.

We will notify you in writing whether your request has been approved or denied within 30 calendar days after we have received a completed request for access form. If we cannot find any requested record or it does not exist, then we will notify you by way of affidavit that it is not possible to give access to that particular record.

We may have to refuse you access to a record to protect others.

How we will give you access

We will evaluate and consider all requests to us in terms of PAIA. If we approve your request for access to our records, then we will decide how to provide access to you – unless you have asked for access in a specific form. Publication of this manual does not give rise to any rights to access information records, except in terms of PAIA.

How much it will cost you

You must pay us a request fee as required by law when submitting a request for access to information. The prescribed fees are as set out in the Fee Schedule which is available here: [http://www.sahrc.org.za/home/21/files/PAIA%20Notice%20on%20fees.pdf](http://www.sahrc.org.za/home/21/files/PAIA%20Notice%20on%20fees.pdf). You must pay us the fees before we will hand over any information. You may have to pay a further access fee if we grant the request for any time that has exceeded the prescribed hours to search and prepare the record for disclosure.

How we process and protect personal information

We process the personal information of various categories of people for various purposes as set out in this clause.

Categories of people

We process the personal information of the following categories of people:

• customers (natural and juristic persons);
• prospects or leads;
• job applicants;
• employees;
• recruiters and medical practitioners providing services related to employees;
• affiliates, agents, distributors or other resellers;
• contractors, vendors, or suppliers;
• credit applicants and the personal information of directors or members of credit applicants;
• employees’ family members or dependants;
• children and their guardians;
• competition entrants;
• debtors and creditors;
• dealers; and
• directors and shareholders.

Purposes
We process the personal information to:

• provide our goods or supply our services;
• better understand our data subjects’ needs when doing so;
• keep our data subject records up-to-date;
• manage employees in general;
• manage contracts in general;
• manage supplier contracts in general;
• manage dealer relationships in general;
• manage customers in general;
• manage customer credit in general, and to conduct credit reference checks and assessments;
• market and sell to customers; in various countries;
• attend to legal proceedings;
• maintain records and accounts in general;
• enforce debts;
• market goods and services to prospects;
• run promotional competitions for businesses;
• process customer requests or complaints;
• detect and prevent fraud, crime, money laundering and other malpractice; and
• process personal information of employees for remuneration and provision of benefits.

Categories of personal information
We process many different categories of personal information, including:

• contact details, such as phone numbers, physical and postal addresses, and email addresses;
• personal details, such as names, ages, date of birth and identification numbers (such as IDs, driver’s licenses and company registration numbers);
• demographic details, such as races and age groups;
• banking details;
• health information;
• biometric information;
• account numbers;
• background information;
• contract information;
• financial information and credit information (including credit history);
• B-BBEE information;
• market intelligence information;
• customer geolocations;
• confidential correspondence;
• employee tax-related information;
• employee information (such as employment history)
• educational information; and
• debt and debtor information.

Third-party disclosures

We give the following people personal information that we process in the ordinary course of business to
fulfil our obligations to our customers or clients:
• contractors, vendors, or suppliers;
• affiliates, agents, distributors, or other resellers;
• other persons related to us as described in the Companies Act 2008;
• employees that require it for their jobs;
• operators, other responsible parties, or co-responsible parties; and
• third party service providers who provide various services including capturing and organising of
data, storing of data, email security, filtering and archiving, conducting due diligence and credit
checks, and administration of payroll, medical aid and pension schemes.

Cross-border transfers

We may send personal information outside of South Africa to various countries. We try our best to ensure
that we only transfer data to other countries who have similar privacy laws to South Africa’s, or recipients
who can guarantee the protection of personal information to the same standard we must protect it. We
may send personal information to our authorised dealers, customers and suppliers in other countries. We
may store personal information in data centres hosted outside South Africa, which may not have
adequate data protection laws. We will endeavour to ensure that our dealers and suppliers will make all
reasonable efforts to secure the personal information.

Security

We secure data by maintaining reasonable measures to protect personal information from loss, misuse,
and unauthorized access, disclosure, alteration and destruction. We also take reasonable steps to keep
personal information accurate, current, complete, confidential and reliable for its intended use. Our
outsourced service providers who process personal information on our behalf undertake to implement
security controls. Our security measures are in line with industry practice and include:
• firewalls;
• virus protection software and update protocols;
• logical and physical access controls; and
• secure setup of hardware and software making up the IT infrastructure.

We do our best to keep all data in our possession secure and up-to-date.

Remedies

If your request for access is denied, you may:
• apply to a court with appropriate jurisdiction, or
• lodge a complaint with the Information Regulator,
for the necessary relief.

**Availability of this Manual**

This manual is available in English and will be available on our website, and at our company offices. The manual is also electronically available on our website.

**Updates to this Manual**

This manual will be updated whenever we make material changes to the current information.