

# Spilatrim CC t/a Knowledge Anchors Group

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**(Registration Number: 2010/004346/23)**

Manual in terms of section 51 of the Promotion of  
Access to Information Act, 2 of 2000

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**Date of Compilation:** 11/09/2024

**Date of Revision:** 11/09/2024

Afrikaans Version

Zulu Version



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## **PROMOTION OF ACCESS TO INFORMATION ACT, 2 OF 2000 (THE ACT)**

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# PROMOTION OF ACCESS TO INFORMATION ACT, 2 OF 2000 (THE ACT)

## SECTION 51 MANUAL OF SPILATRIM CC T/A KNOWLEDGE ANCHORS GROUP (REGISTRATION NUMBER: 2010/004346/23)

### 1. CONTACT PARTICULARS

<b>Head of business:</b>	DR NIMROD MBELE	<b>Information officer:</b>	MF PHALANE
<b>Deputy Information officer(s):</b>	MJ NDABA		
<b>Postal Address:</b>	BUILDING 2 COUNTRY CLUB ESTATES WOODMEAD JOHANNESBURG 2191	<b>Physical Address:</b>	BUILDING 2 COUNTRY CLUB ESTATES WOODMEAD JOHANNESBURG 2191
<b>Telephone Number:</b>	011 258 8667		
<b>E-mail Address:</b>	info@knowledgeanchors.co.za		
<b>Website:</b>	www.knowledgeanchors.co.za		

### 2. INTRODUCTION

At Knowledge Anchors Group, we understand that your greatest competitive advantage is your people and culture. Exceptional governance, strong foundations. We consist of three main structures. Consulting Our team comprises highly qualified and experienced individuals who understand the complex and dynamic nature of the business environment. Training, We recognise the uniqueness of your learning and training needs and create tailor-made learning solutions that change behaviour and impact change. Governance Our partnership approach ensures the right fit governance structures by applying the principles of good corporate governance.

### 3. GUIDE IN TERMS OF SECTION 10 OF THE ACT

**3.1** The ACT 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.

**3.2** 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 section 53 and 54 of the Act.

**3.3** Requesters are referred to the Guide in terms of Section 10 which has been compiled by the South African Human Rights Commission, which will contain information for the purposes of exercising Constitutional Rights. The Guide is available from the SAHRC. The contact details of the Commission are:

Postal Address: Private Bag 2700, Houghton, 2041  
Telephone Number: (+27)11 877 3600  
Fax Number: (+27)11 403 0625  
Website: [www.sahrc.org.za](http://www.sahrc.org.za)

#### 4. FACILITATION OF A REQUEST FOR ACCESS TO INFORMATION

Information which is not readily available as indicated in this manual, may be requested in accordance with the procedure prescribed in terms of The Act. Copies of the prescribed forms to be completed for submitting a request, are available from **Spilatrime CC t/a Knowledge Anchors Group, [www.knowledgeanchors.co.za](http://www.knowledgeanchors.co.za)**

#### 5. INFORMATION AVAILABLE IN TERMS OF OTHER APPLICABLE LEGISLATION

- Banks Act 94 of 1990
- Basic Conditions of Employment Act 75 of 1997
- Broad-based Black Economic Empowerment Act 53 of 2003
- Businesses Act, 71 of 1991
- Co-operative Banks Act 40 of 2007
- Compensation for Occupational Injuries and Health Diseases Act 130 of 1993
- National Credit Act 34 of 2005
- Occupational Health and Safety Act 85 of 1993
- Promotion of Access to Information Act 2 of 2000
- Protection of Businesses Act 99 of 1978
- Protection of Personal Information Act 4 of 2013
- Tax Administration Act 28 of 2011
- Unemployment Insurance Act 63 of 2001
- Value Added Tax Act 89 of 1991

#### 6. INFORMATION AUTOMATICALLY AVAILABLE

- Pamphlets \ Brochures
- Posters
- Pricelists
- Reports
- Marketing and Promotional Material
- [www.knowledgeanchors.co.za](http://www.knowledgeanchors.co.za)

#### 7. INFORMATION AVAILABLE IN TERMS OF THE ACT - ON REQUEST

##### **Statutory Business Records**

- Certificate of Incorporation
- Certificate to Commence Business
- Directors Attendance Register
- Memorandum of Incorporation
- Minutes of Shareholders Meetings
- Minutes of Directors Meetings
- Register of Directors and Officers

- Register of Directors Shareholding
- Resolutions
- Shareholders Agreements
- Cooperation Agreements
- Minute Books
- Resolutions Passed at Meetings

### **Accounting Records**

- Annual financial statements and working papers
- General ledger
- Subsidiary ledgers (receivables, payables, etc.)
- Bank statements, cheque books, cheques
- Customer and supplier statements and invoices
- Deposit slips
- Cash books and petty cash books
- Fixed asset register
- Tax returns and assessments
- VAT returns
- Lease or instalment sale agreements
- Budgets and business plans
- Insurance records
- Investment records
- Auditor's reports
- Systems documentation
- Management reviews
- Credit agreements

### **Distribution and Transportation**

- Permits and licenses

### **Environment, Health and Safety**

- Permits, licenses, approvals and registrations for operations of sites and business
- Safety management systems, data and audits

### **Fixed Property**

- Building plans
- Leases
- Mortgage bonds or other encumbrances
- Title deeds

### **Information Technology**

- Agreements
- Capacity and utilisation of current systems
- Client database
- Disaster recovery
- Hardware

- Internet
- Licenses
- Systems support, programming and development
- LAN Installations
- Operating systems
- Software packages
- Telephone exchange equipment
- Telephone lines, leased lines and data lines

### **Insurance**

- Claim records
- Details of coverage, limits and insurers
- Insurance policies

### **Intellectual Property**

- Agreements relating to intellectual property
- Copyrights
- Designs, trademarks, trade names and protected names

### **Legal, Agreements and Contracts**

- Agreements with contractors, suppliers and clients
- Agreements with customers
- Agreements with shareholders, officers or directors
- Complaints, pleadings, briefs and other documents pertaining to actual, pending or threatened litigation, arbitration or investigation
- Joint venture agreements, partnership agreements, participation, franchise, co-marketing, co-promotion or other alliance agreements
- Material agreements relating to provision of services or materials
- Contracts, including lease agreements and finance agreements
- Sale agreements
- Settlement agreements
- Warranty agreements

### **Personnel Records**

- Attendance register
- Collective agreements
- Disciplinary records
- Employee evaluation and performance records
- Employee information records
- Employment applications
- Employment contracts
- Employment equity plan
- Health and safety records
- IRP 5 and IT 3 certificates
- Organisational design
- Payroll

- Personnel File
- Policies and procedures
- Salary and wage registers
- Salary slips and wage cards
- Tax returns of employees
- Time records
- Training and development
- UIF, PAYE and SDL returns
- Workmen's Compensation Documents

### **Sales and Marketing**

- Brochures, newsletters and marketing material
- Customers
- Media releases
- Products
- Public relations policies and procedures
- Sales
- Service and product information

## **8. GENERAL**

N/A

## **9. REQUESTING PROCEDURES**

A person who wants access to the records must complete the necessary request forms that is available at the offices of Spilatrini CC t/a Knowledge Anchors Group, or can be accessed on [www.justice.gov.za/inforeg](http://www.justice.gov.za/inforeg). The completed request form must be sent to the address or fax number provided in this manual and marked for the attention of the Information Officer.

Please provide sufficient details to enable the company to identify:

- The record(s) requested
- The requester (and if an agent is lodging the request, proof of capacity)
- The form of access required
- The postal address or fax number of the requester in the Republic
- If the requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof
- 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.

## 10. PRESCRIBED FEES

- A requestor is required to pay the prescribed fees before a request will be processed;
- 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);
- A requestor may lodge an application with a court against the tender/payment of the request fee and/or deposit
- Records may be withheld until the fees have been paid.
- The fee structure is available on the website of the SOUTH AFRICAN HUMAN RIGHTS COMMISSION at [www.sahrc.org.za](http://www.sahrc.org.za) and as an appendix to this manual.

## 11. PROTECTION OF PERSONAL INFORMATION PROCESSED

COMPANY is committed to protecting the privacy of personal information of our data subjects. The information you share with us as a data subject allows us to provide you with the best experience with our products and services, or as a stakeholder.

COMPANY has dedicated policies and procedures in place to protect all personal information collected and processed by us. Please read below for more information on how we collect, process, use and disclose personal information.

### 11.1 The purpose of processing of personal information

We process personal information for various reasons, including but not limited to the following:

- To manage information, products and/or services requested by data subjects
- To help us identify data subjects when they contact us
- Manage customers
- To maintain customer records
- Recruitment purposes
- Employment purposes
- Training purposes
- General administration
- Financial and tax purposes
- Legal or contractual purposes
- Health and safety purposes
- To monitor access, secure and manage our premises and facilities
- To transact with our suppliers
- To improve the quality of our products and services
- To help us detect and prevent fraud and money laundering under FICA
- To help us recover debts
- Marketing purposes
- Engaging with the public

### 11.2 Data subject categories and personal information processed



Business partners	e-mail address ID number Physical address Telephone number
Customers	e-mail address ID number Physical address Telephone number
Employees	Age Colour Education history e-mail address Employment history Gender ID number Marital status Physical address Race Sex Telephone number
Group companies	e-mail address ID number Physical address Telephone number
Prospective employee	Age Colour Education history e-mail address Employment history Gender ID number Marital status Physical address Race Sex Telephone number
Suppliers	e-mail address ID number Physical address Telephone number
Visitors (Walk	in) - e-mail address in) - ID number in) - Physical address in) - Telephone number

### 11.3 Recipients with whom personal information is shared

In processing your personal information, we may share it within the group of companies or with other third parties. These include but are not limited to:

- Statutory authorities
- Tax authorities
- Industry bodies
- Contractors, vendors, or suppliers
- Payment processors
- Email management and distribution tools
- Data storage providers
- Server hosts
- Group companies
- Agents
- Service providers

#### **11.4 Security measures implemented to protect personal information**

We have identified our security risks over the personal information we process in line with the Protection of Personal Information Act, and we have implemented various security measures to ensure reasonable protection against the risk of loss, misuse, unauthorised access and disclosure, alteration and destruction of the personal information.

We also take steps to ensure that operators that process personal information on behalf of company name apply adequate safeguards as outlined above.

#### **11.5 Trans-border flows of personal information**

We may transfer to, and store personal information we collect about you, in countries other than South Africa, if the relevant business transactions or situation requires trans-border processing. These countries may not have the same data protection laws as South Africa, and in this instance, we will only transfer the information if we have consent from you, or it is necessary for the performance or conclusion of a contract between us.

#### **11.6 Personal information received from third parties**

When we receive personal information from a third party on behalf of a data subject, we require confirmation that they have written consent from the data subject that they are aware of the contents of this PAIA manual and the Privacy Policy, and do not have any objection to our processing their information in accordance with this policy.

Where information on third parties is provided by a data subject, or a third party provides information on a data subject, that information may be taken into account with other personal information.

#### **11.7 Data Breaches**

Where there are reasonable grounds to believe that the personal information of a data subject has been accessed or acquired by any unauthorised person, Spilattrim CC t/a Knowledge Anchors Group shall notify:

- a) the Regulator; and
- b) the data subject, unless the identity of such data subject cannot be established.

The notification will be made as soon as reasonably possible after the discovery of the compromise, taking into account the legitimate needs of law enforcement or any measures reasonably necessary to determine the scope of the compromise and to restore the integrity of the responsible party's information system.

## 12. AVAILABILITY OF THE MANUAL

Copies of the manual are available for inspection, free of charge, at the offices of Spilatrini CC t/a Knowledge Anchors Group, from the South African Human Rights Commission and at: [www.knowledgeanchors.co.za](http://www.knowledgeanchors.co.za)