

**PRINTIT ZA (PTY) LIMITED**

**(REGISTRATION NUMBER: 2018/622148/07)**

**“PRINTIT”**

# **PAIA MANUAL**

**Prepared in terms of section 51 of the  
Promotion of Access to Information Act  
2 of 2000 (as amended)**

**DATE OF COMPILATION: October 2021**

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## 1. LIST OF ACRONYMS AND ABBREVIATIONS

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

## 2. DEFINITIONS

- 2.1. **Conditions of Lawful Processing** means the conditions for the lawful processing of Personal Information as fully set out in chapter 3 of POPI;
- 2.2. **Constitution** means the Constitution of the Republic of South Africa, 1996;
- 2.3. **Data Subject** has the meaning ascribed thereto in section 1 of POPI;
- 2.4. **Head of the Company** means the “head” as defined in section 1 of PAIA and referred to in clause 4 of this manual;
- 2.5. **Information Officer** means the duly authorised and appointed Information Officer of PRINTIT as referred to in clause 4 of this manual;

- 2.6. **Manual** means this manual prepared in accordance with section 51 of PAIA;
- 2.7. **Personal Information** has the meaning ascribed thereto in section 1 of POPI;
- 2.8. **POPI Regulations** mean the regulations promulgated in terms of section 112 (2) of POPI;
- 2.9. **Private Body** has the meaning ascribed thereto in sections 1 of both PAIA AND POPI;
- 2.10. **Privacy Policy** means the Privacy Policy of PrintIt describing its policies and procedures on the collection, use and disclosure of Data Subjects Personal Information as well as the privacy rights of Data Subjects and how the law protects Data Subjects, obtainable from its websites (the details of which are provided below) and at the URLs of the Privacy Policy in respect of each as indicated:

2.10.1. <https://onlineprintshop.printitza.co.za:>

(<https://onlineprintshop.printitza.co.za/default/privacy-policy>) and

2.10.2. <https://www.printitza.co.za:> (<https://www.printitza.co.za/privacy-policy.html>)

or from its offices or via electronic means, upon request to the Information Officer.

- 2.11. **Processing** has the meaning ascribed thereto in section 1 of POPI;
- 2.12. **Responsible Party** has the meaning ascribed thereto in section 1 of POPI;
- 2.13. **Record** has the meaning ascribed thereto in section 1 of PAIA and includes Personal Information;
- 2.14. **PrintIt** means PrintIt ZA (Pty) Limited with registration number 2018/622148/07, a brokerage and marketing private company having its principal place of business

situated at International Business Gateway Park, Corner 6<sup>th</sup> and New Road, Midrand, Gauteng.

- 2.15. **Requester** has the meaning ascribed thereto in section 1 of PAIA;
- 2.16. **Request for Access** has the meaning ascribed thereto in section 1 of PAIA;
- 2.17. **Services** mean the services provided by PRINTIT being amongst others, digital marketing strategies, lithographic printing, digital printing, variable data printing, web2print, cross-channel marketing, design and layout, point of sale displays, printing solutions, web-based online printing services and products and all related services whether through a written, or verbal agreement and/or the access to the Website and/or any of PrintIt's social media platforms;
- 2.18. **Website** means <https://onlineprintshop.printitza.co.za> and <https://www.printitza.co.za>

### 3. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 3.1 check the categories of records held by PRINTIT which are available without a person having to submit a formal PAIA request;
- 3.2 have a sufficient understanding of how to make a request for access to a record of PRINTIT, by providing a description of the subjects on which PRINTIT holds records and the categories of records held on each subject;
- 3.3 know the description of the records of PRINTIT which are available in accordance with any other legislation;
- 3.4 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;

- 3.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 3.6 know if PrintIt will process Personal Information, the purpose of processing of Personal Information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 3.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 3.8 know the recipients or categories of recipients to whom the Personal Information may be supplied;
- 3.9 know if PrintIt has planned to transfer or process Personal Information outside the Republic of South Africa and the recipients or categories of recipients to whom the Personal Information may be supplied; and
- 3.10 know whether PRINTIT has appropriate security measures to ensure the confidentiality, integrity and availability of the Personal Information which is to be processed.

#### **4. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF PRINTIT**

##### **4.1. Chief Information Officer**

Name: Lance Sadie  
Tel: +27 73 035 2111  
Email: lance@printitza.co.za  
Fax number: +27 11 848 0036

##### **4.2 Access to information general contacts**

Email: lance@printitza.co.za

### 4.3 National or Head Office

Postal Address: International Business Gateway Park  
Corner 6<sup>th</sup> and New Road  
Midrand, Gauteng  
1685

Physical Address: International Business Gateway Park  
Corner 6<sup>th</sup> and New Road  
Midrand, Gauteng

Telephone: (+27) 11 848 0000

Email: lance@printitza.co.za

Website: <https://onlineprintshop.printitza.co.za> and <https://www.printitza.co.za>

## 5. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

5.1. The Regulator has, in terms of section 10(1) of PAIA (as amended) 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.

5.2. The Guide is available in each of the official languages and in braille.

5.3. The aforesaid Guide contains the description of-

5.3.1. the objects of PAIA and POPIA;

5.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-

5.3.2.1. the Information Officer of the body, in this instance being a private body,  
and

5.3.2.2. every Deputy Information Officer of the body, in this instance being a private body, designated in terms of section 17(1) of PAIA<sup>1</sup> and section 56 of POPIA<sup>2</sup>;

5.3.3. the manner and form of a request for-

5.3.3.1. access to a record of a public body contemplated in section 11<sup>3</sup> (which is not applicable in this instance); and

5.3.3.2. access to a record of a private body contemplated in section 50<sup>4</sup> ;

5.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA (which is not applicable in this instance);

5.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;

5.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-

5.3.6.1. an internal appeal;

5.3.6.2. a complaint to the Regulator; and

5.3.6.3. an application with a court against a decision by the information officer of a public body (which is not applicable in this instance), a decision on internal

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<sup>1</sup> Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

<sup>2</sup> Section 56(a) of POPIA- *Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

<sup>3</sup> Section 11(1) of PAIA- *A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

<sup>4</sup> Section 50(1) of PAIA- *A requester must be given access to any record of a private body if-*

- a) *that record is required for the exercise or protection of any rights;*
- b) *that person complies with the procedural requirements in PAIA relating to a request for access to that record; and*
- c) *access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*



appeal or a decision by the Regulator or a decision of the head of a private body;

5.3.7. the provisions of sections 14<sup>5</sup> and 51<sup>6</sup> requiring a public body (which is not applicable in this instance) and private body, respectively, to compile a manual, and how to obtain access to a manual;

5.3.8. the provisions of sections 15<sup>7</sup> and 52<sup>8</sup> providing for the voluntary disclosure of categories of records by a public body (which is not applicable in this instance) and private body, respectively;

5.3.9. the notices issued in terms of sections 22<sup>9</sup> and 54<sup>10</sup> regarding fees to be paid in relation to requests for access; and

5.3.10. the regulations made in terms of section 92<sup>11</sup>.

5.4. Members of the public will be able to inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

5.5. The Guide can also be obtained-

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<sup>5</sup> Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

<sup>6</sup> Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

<sup>7</sup> Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

<sup>8</sup> Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

<sup>9</sup> Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

<sup>10</sup> Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

<sup>11</sup> Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

- (a) any matter which is required or permitted by this Act to be prescribed;
- (b) any matter relating to the fees contemplated in sections 22 and 54;
- (c) any notice required by this Act;
- (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- (e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

5.5.1. upon request to the Information Officer;

5.5.2. from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).

5.6 A copy of the Guide is available in the following three official languages, for public inspection during normal office hours-

5.6.1 English, Afrikaans and Sesotho.

## 6. CATEGORIES OF RECORDS OF PRINTIT WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Types of the Record	Available on Website	Available upon request
Manuals, Privacy Policy and ad hoc policies	<ul style="list-style-type: none"><li>• Manual</li><li>• Privacy Policy</li></ul>	Yes	Yes
Company Records	<ul style="list-style-type: none"><li>• Memorandum of Incorporation</li><li>• Share Register and other statutory registers</li></ul>	No	Yes
Human Resources department	<ul style="list-style-type: none"><li>• List of Employees</li><li>• Employment contracts</li><li>• Employment history</li><li>• Employee information</li><li>• Disciplinary Records</li><li>• Compensation records</li><li>• Employment Equity Plan and Report</li></ul>	No	Yes

	<ul style="list-style-type: none"> <li>Employee tax information</li> <li>Payroll records</li> <li>Internal Policies and Procedures</li> </ul>		
Clients, Third Party and Suppliers Information	<ul style="list-style-type: none"> <li>Agreements with clients and service providers</li> <li>Correspondence with clients, service providers and third parties</li> <li>Records relating to Clients and Service Providers</li> </ul>	No	Yes

**7. DESCRIPTION OF THE RECORDS OF PRINTIT WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION**

<b>Category of Records</b>	<b>Applicable Legislation</b>
Memorandum of incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Broad Based Black Economic Empowerment compliance	Broad-based Black Economic Empowerment Act 53 of 2003
Paper and packaging products	National Environmental Management Waste Act of 59 of 2008 and the Regulations thereto, where applicable
Printing, coating and lamination processes documentation	National Environmental Management: Air Quality Act 39 of 2004
Trade marks, copyright and designs	Copyright Act 98 of 1978 (as amended)
Employment equity plan and report	Employment Equity Act 55 of 1998
Printer documents and certifications	Imprint Act 43 of 1993

Health and Safety policies	Occupational Health and Safety Act 85 of 1993
Employment tax information	South African Revenue Services
Licenses and intellectual property	Trade Marks Act 194 of 1993
Energy Performance (if applicable)	National Energy Act 34 of 1998
Carbon emissions tax (if applicable)	Carbon Tax Act 15 of 2019

**8. DESCRIPTION OF THE SUBJECTS ON WHICH PRINTIT HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT**

<b>Subjects on which the body holds records</b>	<b>Categories of records</b>
Strategic Documents, Plans, Proposals	<ul style="list-style-type: none"> <li>• Annual Reports</li> <li>• Strategic Plan</li> <li>• Annual Performance Plan.</li> </ul>
Human Resources	<ul style="list-style-type: none"> <li>• HR policies and procedures</li> <li>• Advertised posts</li> <li>• Employees records</li> <li>• Disciplinary Records</li> <li>• Payroll records</li> <li>• Compensation records</li> <li>• Internal policies and procedures</li> <li>• Employment history</li> <li>• Employment contracts</li> <li>• List of employees</li> </ul>
Finance	<ul style="list-style-type: none"> <li>• Annual Financial Statements</li> <li>• Tax Returns</li> <li>• Tax Clearance Certificate</li> <li>• Accounting Records</li> <li>• Banking Records</li> <li>• Audit Reports</li> <li>• Invoices</li> </ul>

Subjects on which the body holds records	Categories of records
	<ul style="list-style-type: none"> <li>• Insurance records</li> <li>• Lease records</li> <li>• Asset Register</li> <li>• Insurance Policies</li> <li>• Budgets</li> <li>• Utility Statements</li> </ul>
Clients, Third Party and Suppliers Information	<ul style="list-style-type: none"> <li>• Agreements with clients and service providers</li> <li>• Correspondence with clients, service providers and third parties</li> <li>• Records relating to Clients and Service Providers</li> </ul>

## 9. PROCESSING OF PERSONAL INFORMATION

### 9.1. Purpose of Processing Personal Information

9.1.1 PrintIt will process Personal Information in the ordinary course of its business and in relation to providing the Services. PrintIt will primarily use Personal Information only for the purpose for which it was originally or primarily collected. PrintIt may process Personal Information for a further purpose only if such purpose constitutes a legitimate interest and is closely related to the original or primary purpose for which the Personal Information was collected. Further details on the purpose of the processing of Personal Information done by PRINTIT can be found in PrintIt's Privacy Policy which is obtainable from its websites (the details of which are provided below) and at the URLs of the Privacy Policy in respect of each as indicated:

9.1.1.1 <https://onlineprintshop.printitza.co.za:>

(<https://onlineprintshop.printitza.co.za/default/privacy-policy>) and

9.1.1.2 <https://www.printitza.co.za:> (<https://www.printitza.co.za/privacy->

[policy.html](#))

## 9.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

9.2.1 PrintIt processes such information as is required in the ordinary course of its business, including, without being exhaustive, the following categories of Personal Information:

<b>Categories of Data Subjects</b>	<b>Personal Information that may be processed</b>
Customers / Clients	First name and last name; title; phone number; address; email address; photographs; biometric information; identifying number; location information; online identifier; demographic information; gender; date of birth; Identity Number; Passport Number, nationality; language preferences; bank statements, agreements with third parties; records of any interactions with; bank account numbers; data relating to visits to PrintIt's Website and social media platforms, device types which accesses PrintIt's Website and social media platforms, IP address, location details and other technical communications information
Service Providers	Names, registration number, vat numbers, address, trade secrets and bank details
Employees	First name and last name; title; phone number; address; email address; photographs; biometric information; identifying number; location information; online identifier; demographic information; gender; date of birth; Identity Number; Passport Number, nationality; language

Categories of Data Subjects	Personal Information that may be processed
	preferences; bank statements, agreements with third parties; records of any interactions with PRINTIT; bank account numbers

9.2.1 Further information on the description of the categories of data subjects and of the information or categories of information relating thereto, can be found in PrintIt Privacy Policy which is obtainable from its websites (the details of which are provided below) and at the URLs of the Privacy Policy in respect of each as indicated:

9.2.1.1 <https://onlineprintshop.printitza.co.za>:  
(<https://onlineprintshop.printitza.co.za/default/privacy-policy>) and

9.2.1.2 <https://www.printitza.co.za>: (<https://www.printitza.co.za/privacy-policy.html>)

### 9.3 The recipients or categories of recipients to whom the personal information may be supplied

9.3.1 PrintIt may cause Data Subjects' Personal Information to be supplied to its employees, service providers, agents, other companies within the PrintIt group and other third parties for the purposes as set out in this manual. Further information on the recipients or categories of recipients to whom the Personal Information may be supplied can be found in PrintIt's Privacy Policy which is obtainable from its websites (the details of which are provided below) and at the URLs of the Privacy Policy in respect of each as indicated:

9.3.1.1 <https://onlineprintshop.printitza.co.za>:  
(<https://onlineprintshop.printitza.co.za/default/privacy-policy>) and

9.3.1.2 <https://www.printitza.co.za>: (<https://www.printitza.co.za/privacy-policy.html>)

Category of Personal Information	Recipients or Categories of Recipients to whom the Personal Information may be supplied
Name, Identity Number, Banking Details	Certain employees of PrintIt or such recipients as may be required to render services or comply with legislation
Name, Identity Number, Banking Details	Certain service providers and agents of PrintIt or such recipients as may be required to render services or comply with legislation
Name, Identity Number, Payment Details	South African Revenue Services
Name, Identity Number, Address, Gender, Qualification, Health Status	Department of Labour

#### 9.4 Planned transborder flows of Personal Information

9.4.1 PrintIt may cause Personal Information to be subjected to cross border transfer and processing and/or retention by third parties in countries that have data laws, regulations and/or legislation that offers similar protection in respect of Personal Information as the POPI Act or to countries which offer less protection. Further information on the planned transborder flows of Personal Information can be found in PrintIt's Privacy Policy which is obtainable from its websites (the details of which are provided below) and at the URLs of the Privacy Policy in respect of each as indicated:

9.4.1.1 <https://onlineprintshop.printitza.co.za>:

(<https://onlineprintshop.printitza.co.za/default/privacy-policy>) and

9.4.1.2 <https://www.printitza.co.za>: (<https://www.printitza.co.za/privacy-policy.html>)



## **9.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information**

9.5.1 PrintIt will ensure that its hosting service provider(s) attends to the hosting of its server(s), Website and other applications on the basis that they use firewalls and other applicable security measures to prevent interference and unauthorised access to Data Subjects Personal Information including but not limited to Data Encryption; Anti-virus and Anti-malware Solutions. PrintIt will further ensure that authorisations to access Data Subjects Personal Information will be limited to those who are required to access such Personal Information for the purposes as set out in this manual. Further information on PrintIt's security measures can be found in PrintIt's Privacy Policy which is obtainable from its websites (the details of which are provided below) and at the URLs of the Privacy Policy in respect of each as indicated:

9.5.1.1 <https://onlineprintshop.printitza.co.za:>

(<https://onlineprintshop.printitza.co.za/default/privacy-policy>) and

9.5.1.2 <https://www.printitza.co.za:> (<https://www.printitza.co.za/privacy-policy.html>)

## **10 AVAILABILITY OF THE MANUAL**

10.2 A copy of the Manual is available-

10.2.1 at its websites (the details of which are provided below) and at the URLs of the Manual in respect of each as indicated:

10.2.1.1 <https://onlineprintshop.printitza.co.za:>

(<https://onlineprintshop.printitza.co.za/default/privacy-policy>) and

10.2.1.2 <https://www.printitza.co.za:> (<https://www.printitza.co.za/privacy-policy.html>)

10.2.2 at the head office of PrintIt for public inspection during normal business hours;

10.2.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

10.2.4 from the Information Regulator upon request.

10.3 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

## **11 UPDATING OF THE MANUAL**

The head of a PRINTIT will on a regular basis update this manual.

***Issued by***

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***Lance Sadie***

***(Chief Executive Officer)***