#### 1 Introduction

This manual is applicable to Galix Networking (Pty) Ltd, Silver Moon IT (Pty) Ltd, Galix Security Solutions (Pty) Ltd, Galix IT Compliance (Pty) Ltd. These entities will collectively be referred to as Galix.

# 2 Purpose of PAIA

PAIA is an Act which gives effect to the constitutional right of access to information held by the State or by another person and which is required for the exercise or protection of any right. Any organisation which receives a request made in terms of PAIA is obliged to give access to the requested information, except where the Act expressly provides that the information may or must not be released.

It is important to note that PAIA recognises certain limitations to the right of access to information, including, but not exclusively, limitations aimed at the reasonable protection of privacy, commercial confidentiality, and effective, efficient and good governance, and in a manner that balances that right with any other rights, including such rights contained in the Bill of Rights in the Constitution.

POPIA was enacted in November 2013, to promote the protection of personal information processed by public and private bodies. POPIA amended certain provisions of PAIA, balancing the need for access to information against the need to ensure the protection of personal information.

### 3 Information Manual

This Manual is compiled in accordance with section 51 of PAIA and the Schedule to PoPIA. It is intended to describe the records held by and on behalf of Galix, to outline the procedure to be followed when requesting access to any of these records in the exercise of the right of access to information.

This Manual is available for public inspection:

- at the physical address of Galix, free of charge;
- on this website, free of charge; and
- on request by any person.

#### 4 Contact Details for Queries

The responsibility for the administration of, and compliance with, PAIA and POPIA have been delegated to the Information Officer.

Any person who wishes to request or query any information from Galix (in order to protect or exercise a right) may contact the Information Officer at the following contact details:

Information Officer: Johannes Briel

Postal address:Physical addressP O Box 3070348 Ontdekkers Road

Cresta Florida
2118 Roodepoort
1709

E-mail: johannes@galix.com Websites: www.galix.com

# 5 Information Regulator's Guide

An Official Guide has been compiled which contains information to assist a person wishing to exercise a right of access to information in terms of PAIA and POPIA. This Guide is made available by the Information Regulator (established in terms of POPIA). Copies of the updated Guide are available from Information Regulator in the manner prescribed.

The contact details of the Information Regulator can be found here <a href="https://justice.gov.za/inforeg/contact.html">https://justice.gov.za/inforeg/contact.html</a>

# 6 Schedule of Records Held by GALIX

Requests for access to documents held by Galix will be in accordance with the terms of PAIA. The following records are available to the requester from Galix's office:

#### 6.1 Personnel Records

"Personnel" refers to any person who works for or provides services to or on behalf of Galix and receives or is entitled to receive, remuneration and any other person who assists in carrying out or conducting the business of Galix. It includes, without limitation, directors (executive and non-executive), all permanent, temporary and part-time staff, as well as contract workers.

Personnel records include:

- Records provided by a third party relating to Galix personnel.
- Conditions of employment and other personnel-related contractual and quasi-legal records, including job applications.
- Internal evaluation records.
- Correspondence and other internal records.

#### 6.2 Customer-related records

"Customer" refers to any natural or juristic person that receives services from Galix. This includes prospective clients who ultimately do not become customers of Galix.

Customer-related records include:

- Any records provided by a customer to a third party acting for or on behalf of Galix.
- Any records provided by a third party.
- Records generated by or within Galix pertaining to the customer.
- Transactional records.
- Correspondence with a client that is implicitly or explicitly of a private or confidential nature.

### 6.3 Financial, IT and Operational records

Records pertaining to Galix's own affairs including:

- Financial records.
- Operational records.
- Information technology.
- Marketing records.
- Internal correspondence.
- Product records.
- Statutory records.
- Internal Policies and procedures.

#### 6.4 Other Party Records

Galix may possess records pertaining to other parties including without limitation, contractors, suppliers, subsidiary/holding companies, joint venture companies, service providers.

Alternatively, such other parties may possess records that can be said to belong to Galix. The following records fall under this category: Personnel, Customer or Operational records which are held by another party as opposed to being held by Galix.

Records held by Galix pertaining to other parties, including without limitation financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors/suppliers.

## 6.5 Records available in terms of other legislation

The requester may also request information that is available in terms of legislation, such as the following:

- The Companies Act 71 of 2008.
- Basic Conditions of Employment Act 75 of 1997.
- Competition Act 89 of 1998.
- Employment Equity Act 55 of 1998.
- National Credit Act 34 of 2005.
- Income Tax Act 58 of 1962.
- Value-added Tax Act 89 of 1991.
- The Labour Relations Act 66 of 1995.
- Occupational Health and Safety Act 85 of 1993.
- Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000.
- Electronic Communications and Transactions Act 25 of 2002.
- Unemployment Insurance Act 63 of 2001.

- Skills Development Act 97 of 1998.
- Consumer Protection Act 68 of 2008.

The above is not an exhaustive list of statutes that may require Galix to keep records.

# 7 Processing Details

In terms of POPIA, data must be processed for a specified purpose. The purpose for which data is processed by Galix will depend on the nature of the data and the particular data subject. This purpose is ordinarily disclosed, explicitly or implicitly, at the time the data is collected.

### 7.1 Purpose of the Processing

Galix processes personnel data for business administration purposes and to the extent required by legislation and regulation. The processing of customer-related records is an integral part of Galix's commercial operations. Third-party and other related party records are processed for business administration purposes.

## 7.2 Categories of Data Subjects

Galix holds information and records on the following category of data subject:

- Employees
- Customers
- Any third party such as contractors, suppliers of service providers

This list of categories of data subjects is non-exhaustive.

## 7.3 Recipients to whom Personal Information may be supplied

Galix may, depending on the nature of the data, supply information or records to the following categories of recipients:

- Regulators, Statutory oversight bodies or similar authorities.
- Any court, judicial forum, or ombudsman,
- South African Revenue Services, or another similar authority,
- Auditing and accounting bodies (internal and external),
- Anyone making a successful application for access in terms of PAIA,

# 8 Security Measures

Galix takes extensive information security measures to ensure the confidentiality, integrity and availability of personal information within Galix's possession. Galix further takes appropriate technical and organisational measures designed to ensure that personal data remain confidential and secure against unauthorised or unlawful processing and against accidental loss, destruction or damage.

# 9 Access to Information

In order to follow the correct steps required please refer to our **PoPIA Policy**.

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