GREYSTONE TECHNOLOGIES

("Greystone")

(Registration Number:2009/013770/07)

MANUAL IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT, ACT NO. 2 OF 2000 ("THE ACT" or “PAIA”)

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1. INTRODUCTION

1.1. Greystone is a technology company and specialises in M2M, M2B and IoT solutions which are offered to its customers.

2. CONTACT DETAILS

COMPANY DETAILS:	
Name of Company:	Greystone Technologies (Pty) Ltd
Street Address:	International Business Gateway, Corner of New Road and Pioneer Avenue, Midrand, Gauteng, 1685
Postal Address:	PO Box 12371, Mill Street, Cape Town, Western Cape, 8010
Telephone Number:	+27 10 593 0848
E-mail:	info@greystonetec.co.za
Website:	https://greystonetec.co.za/
INFORMATION OFFICER DETAILS:	
Name:	Tobias Johannes de Klerk
Telephone Number:	+27 10 593 0848
E-mail:	info@greystonetec.co.za
DEPUTY INFROMATION OFFICERS' DETAILS:	
Name:	Brett Harrison
Telephone Number:	+27 10 593 0848
E-mail:	info@greystonetec.co.za
DEPUTY INFROMATION OFFICERS' DETAILS:	
Name:	Michael Max Eibl
Telephone Number:	+27 10 593 0848
E-mail:	info@greystonetec.co.za

3. AVAILABILITY AND PURPOSE OF THIS PAIA MANUAL

3.1. This PAIA Manual can be requested from Greystone's Information Officer or Deputy Information Officer(s), which copy may also be inspected at Greystone's physical address set forth in paragraph 2 above.

3.2. The primary purpose of this PAIA Manual is to facilitate requests for access to information held by Greystone, which requests shall be made in accordance with the prescribed procedures and at the rates provided for in paragraphs 9 and 10 of this PAIA Manual. In addition to the above, the further purposes of this PAIA Manual, are to describe the records held by Greystone and to clearly articulate the grounds upon which access to any such records may be refused.

4. PAIA AND SECTION 10 GUIDE

4.1. PAIA grants a requester of information access to records of an individual or private body held by an entity or natural person if the record is required for the exercise or protection of any rights. If a public body lodges a request for access to records held by Greystone, such public body must be acting in the public's interest.

4.2. Requests in terms of PAIA shall be done in accordance with the prescribed procedures, at the rates provided and set out by PAIA. The forms and rates are dealt with in paragraphs 9 and 10 of this PAIA Manual.

4.3. Requesters are referred to the Guide in terms of Section 10 of PAIA ("Guide"), which Guide has been amended and updated by the Information Regulator to assist the requester on how to use PAIA in an easily comprehensible form and manner.

4.4. The Guide can also be obtained **here** or:

4.4.1. upon request to the Information Regulator by completing **FORM 1 – REQUEST FOR A COPY OF THE GUIDE** from the webiste of the Regulator (https://inforegulator.org.za/paia-forms/);

4.4.2. a copy of the Section 10 Guide is also available in the following official languages for public inspection during normal office hours (English/isiZulu/Sesotho) at the office of the Information Regulator, situated Woodmead North Office Park, 54 Maxwell Drive Woodmead, Johannesburg, 2191.

5. APPLICABLE LEGISLATION

Greystone keeps information/documents in accordance with the following legislation (please note that this is not an exhaustive list):

- Administration of Estates Act No. 66 of 1965
- Arbitration Act No. 42 of 1965
- Basic Conditions of Employment No. 75 of 1997
- Closed Corporations Act No. 69 of 1984, as amended
- Companies Act No. 71 of 2008
- Compensation for Occupation Injuries and Health Diseases Act No. 130 of 1993
- Consumer Affairs (Unfair Business Practices) Act No. 71 of 1988
- Consumer Protection Act
- Copyright Act No. 98 of 1978
- Credit Agreements Act No. 75 of 1980
- Currency and Exchange Act No. 9 of 1933
- Debtor Collectors Act No. 114 of 1998
- Employment Equity Act No. 55 of 1998
- Finance Act No. 35 of 2000
- Financial Intelligence Centre Act of 2001
- Financial Services Board Act No. 97 of 1990
- Financial Relations Act No. 65 of 1976
- Harmful Business Practices Act No. 23 of 1999
- Income Tax Act No. 58 of 1962
- Insolvency Act No. 24 of 1936
- Insurance Act No. 27 of 1943
- Intellectual Property Laws Amendments Act No. 38 of 1997
- Labour Relations Act No. 66 of 1995
- Long Term Insurance Act No. 52 of 1998
- Medical Schemes Act No. 131 of 1998
- Occupational Health and Safety Act No. 85 of 1993
- Pension Funds Act No. 24 of 1956
- Post Office Act No. 44 of 1958

- Regional Service Councils Act No. 109 of 1985
- SA Reserve Bank Act No. 90 of 1989
- Short Term Insurance Act No. 53 of 1998
- Skills Development Levies Act No. 9 of 1999
- Skills Development Act No. 97 of 1998
- Stamp Duties Act No. 77 of 1968
- Stock Exchange Control Act No. 1 of 1985
- Tax on Retirement Funds Act No. 38 of 1996
- Trade Marks Act No. 194 of 1993
- Transfer Duty Act No. 40 of 1949
- Unemployment Contributions Act No. 4 of 2002
- Unemployment Insurance Act No. 63 of 2001
- Usury Act No. 73 of 1968
- Value Added Tax Act No. 89 of 1991

6. SCHEDULE OF RECORDS

6.1. The following records are not automatically available without a request (please note that this is not an exhaustive list):

- **Limited**
  - Founding Statement and amendments thereto
  - Minute Book

- **Financial Records**
  - Annual Financial Statements
  - Accounting records
  - Asset register
  - Bank and related records
  - Inventory register
  - Income and expense vouchers

- **Taxation Records**
  - PAYE records
  - Documents issued to employees for income tax purposes
  - Records of payments made to SARS on behalf of employees
  - Private body tax return
  - All other statutory compliances:
  - VAT
  - Regional Service Levies
  - Skills Development Levies
  - UIF

- **Personnel Documents and Records**
  - Disciplinary records
  - Employment contracts
  - Labour relation correspondence
  - Leave records
  - Remuneration records and policies
  - SETA records
  - Training manuals
  - Training records

- Workmen's Compensation
- All other related records

7. RECORDS AVAILABLE WITHOUT A REQUEST TO ACCESS IN TERMS OF THE ACT

7.1. The following records and information are automatically available without a person having to request access in terms of PAIA:

7.1.1. Records of a public nature which are in the public domain such as displayed on a website, may be accessed without the need to submit a formal application. Other non-confidential records, such as statutory records maintained at CIPC, may also be accessed without the need to submit a formal application.

8. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS

8.1. Upon receipt of a request for access to information, Greystone will be required to consider such a request in light of the provisions of Section 50 of PAIA. Subject to such consideration, Greystone will be required to either grant such a request or refuse such a request. If Greystone elects to refuse access to a particular record, such refusal will be subject to Greystone's interpretation of the various prescribed grounds for refusal as set forth in Chapter 4 of PAIA and in the table below:

Ground(s) For Refusal	Description and Explanation of Ground(s) for Refusal
Mandatory protection of privacy of third party who is a natural person [Section 63 of PAIA]	Greystone may refuse access to a record if the disclosure of that record would involve the unreasonable disclosure of personal information relating to a third party, including a deceased individual.
Mandatory protection of commercial information of third party [Section 64 of PAIA]	Greystone may refuse a request for access to a record if the record comprises of or is constituted by the following information relating to a third party – • Trade secrets of a third party; • Financial, commercial, scientific or technical information, other than trade secrets, of a third party, which if disclosed is likely to cause harm to the commercial or financial interests of the third party; • Information which has been supplied in confidence by a third party, the disclosure of which could reasonably be expected to place the third party at a disadvantage in contractual or other negotiations or is likely to prejudice the third party in commercial competition.
Mandatory protection of certain confidential information of a third party [Section 65]	Greystone may refuse access to a record which if disclosed would constitute an action for breach of a duty of confidence owed to a third party in terms of an agreement or contractual relationship.
Mandatory protection of safety of individuals and	Greystone may refuse a request for access to record if its disclosure could reasonably be expected to endanger the life or physical safety of an

Ground(s) For Refusal	Description and Explanation of Ground(s) for Refusal
protection of property [Section 66]	individual, or if its disclosure would be likely to prejudice or impair the security of: • a building, structure or system, including but not limited to a computer or communication system, a means of transport or any other property; • method(s), system(s), plans or procedures for the protection of an individual in accordance with a witness protection scheme, the safety of the public, or any part of the public or the security of property.
Mandatory protection of records privileged from production in legal proceedings [Section 67]	Greystone may refuse a request for access to a record if the record is privileged from production in legal proceedings unless the person entitled to the privilege has waived the privilege.
Commercial information of Private Body [Section 68]	Greystone may refuse a request for access to a record if the record contains (or comprises of): • Trade secrets of the Private Body; • Financial, commercial, scientific or technical information, other than trade secrets of the Private Body, the disclosure of which would be likely to cause harm to the commercial or financial interests of the Private Body; • Information, the disclosure of which could reasonably be expected to put the Private Body at a disadvantage in contractual or other negotiations or prejudice the Private Body in commercial competition; • A computer programme (as defined in section 1(1) of the Copyright Act 98 of 1978 as amended) owned by the Private Body, except insofar as it is required to give access to a record to which access is granted in terms of PAIA.
Mandatory protection of research information of third party, and protection of research information of private body [Section 69]	Greystone may refuse a request for access to a record if the record contains information about research being or to be carried out by or on behalf of a third party/private body, the disclosure of which would be likely to expose the third party/private body, a person that is (or will be) carrying out the research on behalf of the third party/private body, or the subject matter of the research to serious disadvantage.

9. FORM OF REQUEST

9.1. To facilitate the processing of your request, kindly:

- Use the prescribed Form, **Form 2**, as provided in **Annexure A** hereto.
- Address your request to Greystone's Information Officer.

- Provide sufficient details to enable Greystone 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 e-mail of the requester in South Africa.
- 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.
- The Information Officer will respond to a request in the format of **Form 3**, as listed in **Annexure B** hereto. The said form is used to report the outcome of a request as well as information regarding the required fees payable, if applicable
- **Kindly refer to Annexure C hereto, setting out the diagram of the PAIA request process.**

10. PRESCRIBED FEES

10.1. The following access fees apply to requests (other than personal requests) and are payable by the requester to cover the costs of finding and copying the records requested:

10.1.1. A requestor is required to pay the prescribed non-refundable fee of R140.00 before a request will be processed by Greystone.

10.1.2. If the preparation of the record requested requires more than the prescribed 6 (six) hours, a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted).

10.1.3. A requestor may lodge an application with a court against the tender/payment of the request fee and/or deposit.

10.1.4. Records may be withheld until the fees have been paid.

11. REMEDIES AVAILABLE WHEN A REQUEST IS DENIED

11.1. Internal Remedies

There is no internal appeal procedure that may be followed after a request to access information has been refused. The decision made by the Information Officer is final.

If a request is denied and the requester is dissatisfied with the Information Officer's decision, the requestor will be required to exercise such external remedies at their disposal if a request for information is refused.

11.2. External remedies

A requestor or a third party who is dissatisfied with an Information Officer's refusal to disclose information or the disclosed information may within 30 (thirty) days of notification of the decision apply to a court with appropriate jurisdiction or contact the Information Regulator for relief.

12. CONTACT DETAILS OF THE INFORMATION REGULATOR

Information Officer Chief Executive Officer:	Mr. Mosalanyane Mosala
Contact Person	Ms. Pfano Nenweli
Email:	PNenweli@justice.gov.za

Deputy Information Officer:	Ms. Varsha Sewlal
Email:	VarSewlal@justice.gov.za
Physical Address:	Woodmead North Office Park, 54 Maxwell Drive Woodmead, Johannesburg, 2191
Postal Address:	P.O. Box 31533 Braamfontein Johannesburg 2017
Telephone:	010 023 5200

ANNEXURE A

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

1.Proof of identity must be attached by the requester.

2.If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

TO: The Information Officer

Information Officer:	Deputy Information Officer:
Address:	Address:
Email:	Email:
Telephone Number:	Telephone Number:

Mark with an "**X**"

[ ] Request is made in my own name [ ] Request is made on behalf of another person

PERSONAL INFORMATION		
Full Names		
Identity Number		
Capacity in which request is made *(when made on behalf of another person)*		
Postal Address		
Street Address		
E-mail Address		
Contact Numbers	Tel:	
	Facsimile:	
	Cellular:	
Full names of person on whose behalf request is made *(if applicable)*		
Identity Number		
Postal Address		
Street Address		
E-mail Address		
Contact Numbers	Tel:	
	Facsimile:	
	Cellular:	

PARTICULARS OF RECORD REQUESTED

Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)

Description of record or relevant part of the record	
Reference number, if available	
Any further particulars of record	

TYPE OF RECORD *(Mark the applicable box with an "X")*	
Record is in written or printed form	
Record comprises virtual images *(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)*	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	

FORM OF ACCESS *(Mark the applicable box with an "X")*	
Printed copy of record *(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)*	
Written or printed transcription of virtual images *(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)*	
Transcription of soundtrack *(written or printed document)*	
Copy of record on flash drive *(including virtual images and soundtracks)*	
Copy of record on compact disc drive *(including virtual images and soundtracks)*	
Copy of record saved on cloud storage server	

MANNER OF ACCESS *(Mark the applicable box with an "X")*	
Personal inspection of record at registered address of public/private body *(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)*	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format *(including transcriptions)*	
E-mail of information *(including soundtracks if possible)*	
Cloud share/file transfer	
Preferred language *(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)*	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED *If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.*	
Indicate which right is to be exercised or protected	

Explain why the record requested is required for the exercise or protection of the aforementioned right:	
FEES	
a) *The non-refundable request fee of R140 must be paid before the request will be considered.* b) *You will be notified of the amount of the access fee to be paid.* c) *The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.* d) *If you qualify for exemption of the payment of any fee, please state the reason for exemption*	
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal Address	**Facsimile**	**Electronic Communication** ***(Please specify)***

Signed at _____ this _____ day of _____ 20____.

_____

Signature of Requester / person on whose behalf request is made

---

FOR OFFICIAL USE

Reference number	
Request received by: *(State rank, Name and Surname of Information Officer)*	
Date received	
Access fees	
Deposit (if any)	

_____

Signature of Information Officer

ANNEXURE B
(for office use)

FORM 3
OUTCOME OF REQUEST AND OF FEES PAYABLE
[Regulation 8]

Note:
1. If your request is granted the—
(a) amount of the deposit, (if any), is payable before your request is processed; and
(b) requested record/portion of the record will only be released once proof of full payment is received.
2. Please use the reference number hereunder in all future correspondence.

Reference Number: _____

TO: _____
_____
_____
_____

Your request dated _____ refers.

1. You requested:

Personal inspection of information at registered address of public/private body *(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)* is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure B.	

OR

2. You requested:

Printed copies of the information *(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)*	
Written or printed transcription of virtual images *(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)*	
Transcription of soundtrack *(written or printed document)*	
Copy of information on flash drive *(including virtual images and soundtracks)*	
Copy of information on compact disc drive *(including virtual images and soundtracks)*	
Copy of record saved on cloud storage server	

3. To be submitted:

Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format *(including transcriptions)*	
E-mail of information *(including soundtracks if possible)*	
Cloud share/file transfer	
Preferred language: *(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)*	

Kindly note that your request has been:

[ ] Approved
[ ] Denied, for the following reasons:

4. Fees payable with regards to your request:

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
Non-refundable fee			**R140.00**
Photocopy	R2.00 per page		
Printed copy	R2.00 per page		
For a copy in a computer-readable form on: i) Flash drive • To be provided by requestor ii) Compact disc • If provided by requestor • If provided to the requestor	 R40.00 R40.00 R60.00		
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record: iii) Flash drive • To be provided by requestor iv) Compact disc • If provided by requestor • If provided to the requestor	 R40.00 R40.00 R60.00		
Postage, e-mail or any other electronic transfer:	Actual Costs		
TOTAL:			

5. Deposit payable (if search exceeds six hours):

[ ] Yes [ ] No

Hours of search		Amount of deposit *(calculated on one third of total amount per request)*	

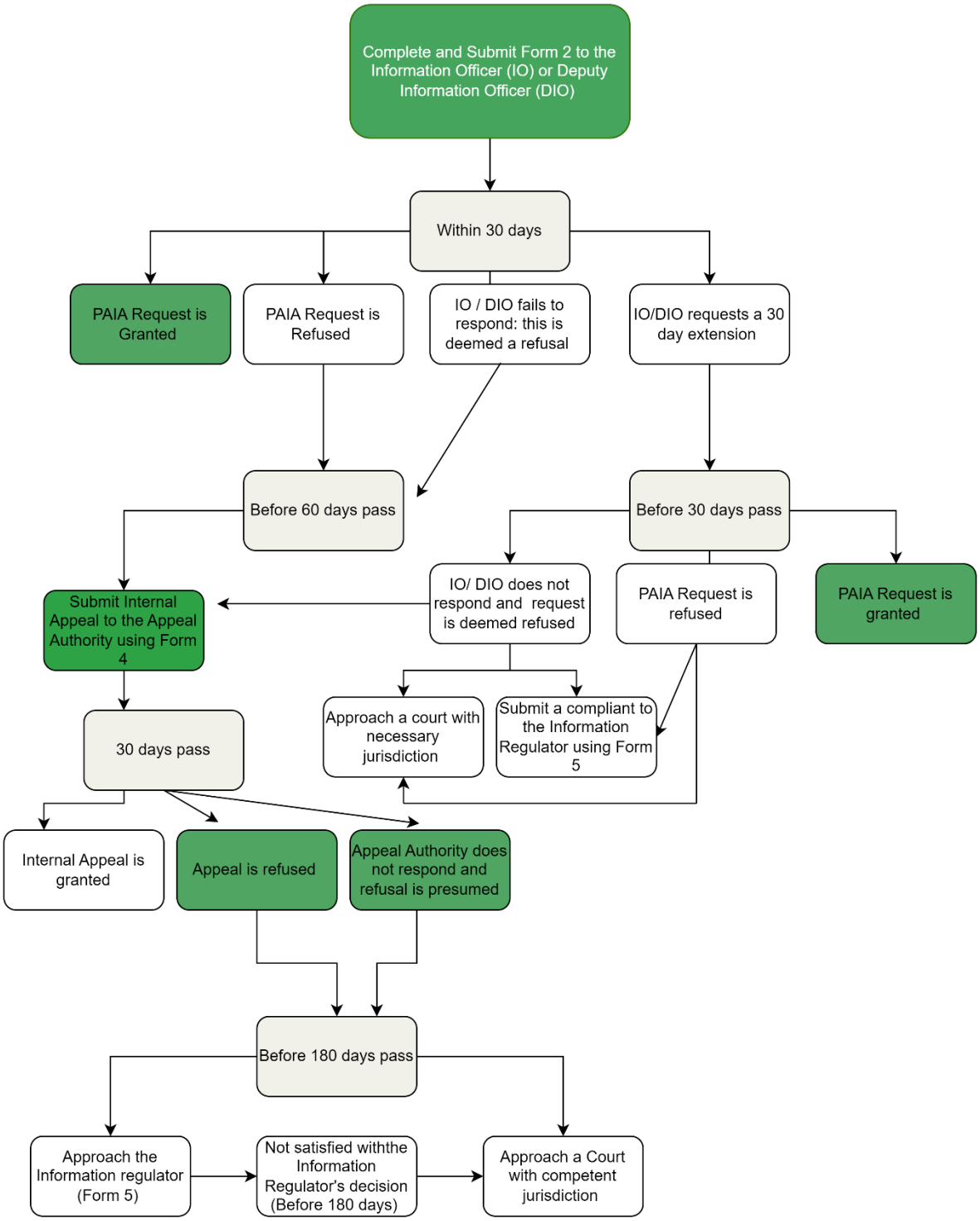
The amount must be paid into the following Bank account of Greystone which can be obtained upon request.

Signed at _____ this _____ day of _____ 20____.

_____

Signature of Information Office

ANNEXURE C
PAIA Request Process



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