

**SGS TECHNICAL SERVICES (PTY) LTD  
(2014/202150/07) AND SUBSIDIARY COMPANIES AND/OR THE  
COMPANIES THAT FORM PART OF THE SGS GROUP OF COMPANIES  
("SGS")**

# **PAIA MANUAL**

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

**DATE OF COMPILATION 1: 01/11/2022  
DATE OF REVISION 2: 01/11/2023  
DATE OF REVISION 3: 01/11/2024  
DATE OF REVISION 4: 01/09/2025  
DATE OF REVISION 5: 10/02/2026**

## TABLE OF CONTENTS

### Contents

1. LIST OF ACRONYMS AND ABBREVIATIONS.....	3
2. INTRODUCTION .....	3
3. ABOUT SGS.....	3
4. PURPOSE OF PAIA MANUAL.....	4
5. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF SGS .....	5
6. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE.....	6
7. CATEGORIES OF RECORDS OF SGS WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS.....	7
8. DESCRIPTION OF THE RECORDS OF SGS WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION .....	8
9. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY SGS .....	9
10. PROCESSING OF PERSONAL INFORMATION .....	11
10.1    Purpose of Processing Personal Information .....	11
10.2    Description of the categories of Data Subjects and of the information or categories of information relating thereto .....	11
10.3    The recipients or categories of recipients to whom the personal information may be supplied.....	12
10.4    Planned transborder flows of personal information.....	13
10.5    General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information .....	13
11. AVAILABILITY OF THE MANUAL.....	14
12. UPDATING OF THE MANUAL.....	14

## 1. LIST OF ACRONYMS AND ABBREVIATIONS

Guide	Guide on how to use the Promotion of Access to Information Act 2 of 2002, as amended.
MD	Managing Director
IO	Information Officer
DIO	Deputy Information Officer
Minister	Minister of Justice and Correctional Services
PAIA	Promotion of Access to Information Act No. 2 of 2000 as Amended
POPIA	Protection of Personal Information Act No.4 of 2013
Private Body	A natural person who carries or has carried on any trade, business or profession, but only in such a capacity. A partnership which carries or has carried on any trade, business or profession. Any former or existing juristic person but excludes a public body.
IR / Regulator	Information Regulator
Republic	Republic of South Africa
SGS	SGS Technical Services (Pty) Ltd and its subsidiaries

## 2. INTRODUCTION

This Manual constitutes the SGS PAIA Manual. This Manual is compiled in accordance with section 51 of PAIA as amended by POPIA, which gives effect to everyone's constitutional right to privacy. POPIA promotes the protection of personal information processed by public and private bodies, including certain conditions so as to establish minimum requirements for the processing of personal information. POPIA and PAIA balances the need for access to information against the need to ensure the protection of personal information by providing for the establishment of an IR to exercise certain powers and perform certain duties and functions in terms of POPIA and PAIA, providing for the issuing of codes of conduct and providing for the rights of persons regarding unsolicited electronic communications and automated decision making in order to regulate the flow of personal information and to provide for matters concerned therewith.

## 3. ABOUT SGS

3.1 The Manual is applicable to SGS, subsidiary companies and/or the companies that form part of the SGS group of companies located in South Africa. The following is a list of subsidiaries and companies forming part of the SGS group of companies:

- SGS Technical Services (Pty) Ltd
- SGS NviroCrop (Pty) Limited
- The SGS Group Community Trust
- SGS Bateman (Pty) Ltd
- SGS South Africa (Pty) Ltd
- SGS Bateman (Pty) Ltd
- SGS Metlab (Pty) Ltd
- SGS Matrolab Holding (Pty) Ltd
- SGS Matrolab (Pty) Ltd
- SGS Matrocast (Pty) Ltd
- Hazgo SA (Pty) Ltd
- Hearshaw and Kinnes Analytical Laboratory (Pty) Ltd
- Cyanre The Digital Forensic Lab (Pty) Ltd
- Cyber Com Africa (Pty) Ltd

- Lex Trado Eds (Pty) Ltd
- Cyanre Holding (Pty) Ltd
- Cyanre Digital and Cyber Services (Pty) Ltd

3.2 The PAIA Manual of SGS is available to view at its premises at Country club estate building 9, 21 Woodlands drive, Woodmead, Gauteng, 2191, as well as on its website at <https://www.sgs.com/en-za>

3.3 This Manual is compiled not only to ensure that SGS complies with PAIA and POPIA, but is also intended to:

- 3.3.1 foster a culture of transparency and accountability within SGS by giving effect to the right to information and records that are required for the exercise or protection of any right.
- 3.3.2 Actively promote a society in which the people of South Africa have effective access to information and records to enable them to exercise and protect their rights.

#### **4. PURPOSE OF PAIA MANUAL**

This PAIA Manual is useful for the public to:

- 4.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 4.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 4.3 know the description of the records of the body which are available in accordance with any other legislation;
- 4.4 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;
- 4.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 4.6 know if the body 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;
- 4.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 4.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 4.9 know if the body 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

4.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

## **5. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF SGS**

### **5.1 Information Officer**

Name: Mr. Gerald van Aswegen (Managing Director)  
Tel: +27(0)11 800 1000  
Email: [privacy.za@sgs.com](mailto:privacy.za@sgs.com)

### **5.2 Deputy Information Officer**

Name: Mr. Renier van der Westhuizen (Legal Counsel)  
Tel: +27(0)11 800 1000  
Email: [privacy.za@sgs.com](mailto:privacy.za@sgs.com)

### **5.3 Access to information general contacts**

Email: [privacy.za@sgs.com](mailto:privacy.za@sgs.com)

### **5.4 National or Head Office**

Postal Address: P O Box 90  
Gallo Manor  
Sandton  
Gauteng  
2052

Physical Address: Country club estate building 9  
21 Woodlands drive  
Woodmead  
Gauteng  
2191

Telephone: +27(0)11 800 1000  
Email: [privacy.za@sgs.com](mailto:privacy.za@sgs.com)  
Website: [www.sgs.com](http://www.sgs.com)

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

- 6.1 The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and 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.
- 6.2 The Guide is available in each of the official languages and in braille.
- 6.3 The aforesaid Guide contains the description of-
  - 6.3.1 the objects of PAIA and POPIA;
  - 6.3.2 the postal and street address, phone and fax number and, if available, electronic mail address of-
    - the Information Officer of every public body, and
    - every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;
  - 6.3.3 the manner and form of a request for-
    - access to a record of a public body contemplated in section 11; and
    - access to a record of a private body contemplated in section 50;
  - 6.3.4 the assistance available from the IO of a public body in terms of PAIA and POPIA;
  - 6.3.5 the assistance available from the Regulator in terms of PAIA and POPIA;
  - 6.3.6 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-
    - an internal appeal;
    - a complaint to the Regulator; and
    - an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
  - 6.3.7 the provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
  - 6.3.8 the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
  - 6.3.9 the notices issued in terms of sections 22 and 54 regarding fees to be

paid in relation to requests for access; and

6.3.10 the regulations made in terms of section 92.

6.4 Members of the public can 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.

6.5 The Guide can also be obtained-

6.5.1 upon request to the Information Officer;

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

6.6 A copy of the Guide is also available in the following two official languages, English and Afrikaans for public inspection during normal office hours.

## 7. CATEGORIES OF RECORDS OF SGS WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Types of the Record	Available on website	Available upon request
<b>News and media</b>	<ul style="list-style-type: none"><li>news releases</li><li>media coverage</li><li>investor day sessions</li><li>transactions</li><li>features</li><li>photos</li><li>videos</li></ul>	<input checked="" type="checkbox"/> X	<input checked="" type="checkbox"/> X
<b>Presentations</b>	<ul style="list-style-type: none"><li>investor days and meetings</li><li>financial and operational results</li></ul>	<input checked="" type="checkbox"/> X	<input checked="" type="checkbox"/> X
<b>Reports and filings</b>	<ul style="list-style-type: none"><li>results updates</li><li>annual reports</li><li>regulatory reports</li></ul>	<input checked="" type="checkbox"/> X	<input checked="" type="checkbox"/> X
<b>Governance</b>	<ul style="list-style-type: none"><li>board and committee documents</li></ul>	<input checked="" type="checkbox"/> X	<input checked="" type="checkbox"/> X

**8. DESCRIPTION OF THE RECORDS OF SGS WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION**

Category of records	Applicable Legislation
• Policies and Standard Operating Procedures	Auditing Professions Act, No 26 of 2005
	Basic Conditions of Employment Act, No 75 of 1997
	Broad- Based Black Economic Empowerment Act, No 75 of 1997
• Guidelines	Business Act, No 71 of 1991
• Codes of conduct	Companies Act, No 71 of 2008
• Forms	Compensation for Occupational Injuries & Diseases Act, 130 of 1993
• Reports	Competition Act, No.71 of 2008
• Schedules	Constitution of the Republic of South Africa 2008
• Registers	Copyright Act, No 98 of 1978
• Transactional records	Customs & Excise Act, 91 of 1964
	Electronic Communications Act, No 36 of 2005
	Electronic Communications and Transactions Act, No 25 of 2002
	Employment Equity Act, No 55 of 1998
	Financial Intelligence Centre Act, No 38 of 2001
	Identification Act, No. 68 of 1997
	Income Tax Act, No 58 of 1962
	Intellectual Property Laws Amendment Act, No 38 of 1997
	Labour Relations Act, No 66 of 1995
	Long Term Insurance Act, No 52 of 1998
	Occupational Health & Safety Act, No 85 of 1993
	Pension Funds Act, No 24 of 1956
	Prescription Act, No 68 of 1969
	Prevention of Organized Crime Act, No 121 of 1998
	Promotion of Access to Information Act, No 2 of 2000
	Protection of Personal Information Act, No. 4 of 2013
	Regulation of Interception of Communications and Provision of Communication-Related Information Act 70 of 2002
	Revenue laws Second Amendment Act. No 61 of 2008
	Skills Development Levies Act No. 9 of 1999
	Short-term Insurance Act No. 53 of 1998
	Trust Property Control Act 57 of 1988
	Unemployment Insurance Contributions Act 4 of 2002
	Unemployment Insurance Act No. 30 of 1966
	Value Added Tax Act 89 of 1991

**9. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY SGS**

Subjects on which SGS holds records	Categories of records
<b>Company Records</b>	<ul style="list-style-type: none"> <li>• All trust deeds</li> <li>• Documents of Incorporation</li> <li>• Index of names of Directors</li> <li>• Memorandum of Incorporation</li> <li>• Minutes of meetings of the Board of Directors</li> <li>• Minutes of meetings of Shareholders</li> <li>• Proxy forms</li> <li>• Register of debenture-holders</li> <li>• Register of directors' shareholdings</li> <li>• Share certificates</li> <li>• Share Register and other statutory registers and/or records and/or documents</li> <li>• Special resolutions/Resolutions passed at General and Class meetings</li> <li>• Records relating to the appointment of: <ul style="list-style-type: none"> <li>◦ Auditors</li> <li>◦ Directors</li> <li>◦ Prescribed Officer</li> <li>◦ Public Officer</li> <li>◦ Secretary</li> </ul> </li> </ul>
<b>Financial Records</b>	<ul style="list-style-type: none"> <li>• Accounting Records</li> <li>• Annual Financial Reports</li> <li>• Annual Financial Statements</li> <li>• Asset Registers</li> <li>• Bank Statements</li> <li>• Banking details and bank accounts</li> <li>• Banking Records</li> <li>• Debtors / Creditors statements and invoices</li> <li>• General ledgers and subsidiary ledgers</li> <li>• General reconciliation</li> <li>• Invoices</li> <li>• Policies and procedures</li> <li>• Rental Agreements</li> <li>• Tax Returns</li> </ul>
<b>Income Tax Records</b>	<ul style="list-style-type: none"> <li>• PAYE records</li> <li>• Documents issued to employees for income tax purposes</li> <li>• Records of payments made to SARS on behalf of employees</li> <li>• All other statutory compliances: <ul style="list-style-type: none"> <li>◦ VAT</li> <li>◦ Regional Services Levies</li> <li>◦ Skills Development Levies</li> <li>◦ UIF</li> <li>◦ Workmen's Compensation</li> </ul> </li> </ul>
<b>Personnel Documents and Records</b>	<ul style="list-style-type: none"> <li>• Address Lists</li> <li>• Disciplinary Code and Records</li> <li>• Employee benefits arrangements rules and records</li> <li>• Employment Contracts</li> <li>• Employment Equity Plan</li> </ul>

	<ul style="list-style-type: none"> <li>Forms and Applications</li> <li>Grievance Procedures</li> <li>Leave Records</li> <li>Medical Aid Records</li> <li>Payroll reports/ Wage register</li> <li>Pension fund records</li> <li>Safety, health and environmental records</li> <li>Salary records</li> <li>SETA records</li> <li>Standard letters and notices</li> <li>Training manuals</li> <li>Training records</li> <li>Workplace and Union agreements and records</li> </ul>
<b>Procurement Department</b>	<ul style="list-style-type: none"> <li>Standard terms and conditions for supply of services and products</li> <li>Contractor, client and supplier agreements</li> <li>Lists of suppliers, products, services and distribution</li> <li>Policies and procedures</li> </ul>
<b>Business Development Department</b>	<ul style="list-style-type: none"> <li>Customer details</li> <li>Credit application information</li> <li>Information and records provided by a third party</li> <li>Advertising and promotional material</li> </ul>
<b>Risk Management and Audit</b>	<ul style="list-style-type: none"> <li>Audit reports</li> <li>Risk management frameworks</li> <li>Risk management plans</li> </ul>
<b>Information and Communication Technology</b>	<ul style="list-style-type: none"> <li>Computer / mobile device usage policy documentation</li> <li>Hardware asset registers</li> <li>Information security policies/standards/procedures</li> <li>Information technology systems and user manuals</li> <li>Information usage policy documentation</li> <li>Project implementation plans</li> <li>Software licensing</li> <li>System documentation and manuals</li> </ul>
<b>Safety, Health and Environment</b>	<ul style="list-style-type: none"> <li>Complete Safety, Health and Environment Risk Assessment</li> <li>Environmental Managements Plans</li> <li>Inquiries, inspections, examinations by environmental authorities</li> </ul>
<b>Corporate Social Responsibility (CSR)</b>	<ul style="list-style-type: none"> <li>CSR schedule of projects/record of organisations that receive funding</li> <li>Reports, books, publications and general information related to CSR spend</li> <li>Records and contracts of agreement with funded organisations</li> </ul>

## 10. PROCESSING OF PERSONAL INFORMATION

### 10.1 Purpose of Processing Personal Information

#### Purpose of Processing Personal Information

##### 10.1.1 SGS processes personal information for the purpose of:

- concluding and executing an employment contract.
- fulfilling a business agreement and matters relating to the agreement.
- detecting and preventing fraud and money laundering and/or in the interest of security and crime prevention.
- assessing and dealing with complaints and requests.
- operational, marketing, auditing, legal and record keeping requirements.
- due diligence, statistical and research purposes.
- verifying identity of a person or the identify of a beneficial owner.
- complying with applicable laws, including lawful requests for information

received from local or foreign law enforcement, government and tax collection agencies.

- recording and/or monitoring electronic communications to/with SGS in order to accurately carry out instructions and requests.
- to use as evidence and in the interests of crime prevention.
- conducting market research to improve or evaluate the effectiveness of SGS's business or products, services or offerings.
- monitoring, keeping record of and having access to all forms of correspondence

or communications received by or sent from SGS or any of its employees, agents or contractors, including monitoring, recording and using as evidence.

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

Category of Data Subjects	Types of the Record
Employees	<ul style="list-style-type: none"> <li>• name, surname, title, address details, contact details, date of birth, age, place of birth, nationality, gender, identity number, passport number, work permit number, employee number, bank account details, vehicle registration number, details about employment history, tax number and financial information, education-, qualification-, and skills and training history, as well as assessment results.</li> <li>• biometric information (such as images, fingerprints), ethnicity and race, health information, union membership and criminal behaviour and records.</li> </ul>

Contractor employees	<ul style="list-style-type: none"> <li>name, surname, title, address details, contact details, date of birth, age, nationality, gender, identity number, passport number, work permit number, vehicle registration number, qualification-, and skills and training history, as well as assessment results.</li> <li>biometric information (such as images, fingerprints), ethnicity and race, health information and criminal behaviour and records.</li> </ul>
Vendors	<ul style="list-style-type: none"> <li>company name, company registration number, company service category details, contact details, address details, Tax/VAT numbers, financial information, bank details, director information, criminal record information, trust details, share certificates and Broad Based Black Economic Empowerment (BEE) status.</li> </ul>
Customers	<ul style="list-style-type: none"> <li>company name, company registration number, name, surname, contact details, address details, VAT number, financial information, identity number.</li> </ul>
Visitors	<ul style="list-style-type: none"> <li>name, surname, contact details, vehicle registration number, identity number, driver's license information.</li> </ul>
Third parties	<ul style="list-style-type: none"> <li>company details, name, surname, contact details, address details, identity number.</li> </ul>

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

Depending on the nature of the personal information, SGS may share information or records with the following categories of recipients:

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identifiers Contact information Financial information Demographic information Educational information Criminal record and behaviour Medical information Employment information	Statutory and regulatory
Identifiers Financial information	Trade Unions
Identifiers Financial information	Financial institutions
Identifiers Contact information	Professional services including external auditors, attorneys, actuaries, etc.

Criminal record and -behaviour Financial information Educational information Employment information Medical information Demographic information	
Identifiers Contact information Employment information Educational information Demographic information	Training institutions and assessors
Identifiers Contact information Financial information Criminal record and -behaviour	Legal and judicial proceedings

#### 10.4 Planned transborder flows of personal information

SGS transfers personal information outside the Republic to Switzerland for cloud hosting and storage purposes and corporate reporting. SGS, when transferring information to another country for any lawful purpose, will ensure that anyone to whom it passes personal information is subject to a law, binding corporate rules or binding agreement which provides an adequate level of protection and the third party agrees to treat that information with the same level of protection as the Company is obliged under POPIA.

The categories of personal information include:

- Identifiers
- Contact information
- Demographic information
- Financial information
- Educational information
- Employment information
- Criminal record and -behaviour

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

SGS takes extensive information security measures to ensure the confidentiality, integrity and availability of information in our possession. SGS takes appropriate technical and organisational measures designed to ensure that information remains confidential and secure against unauthorised or unlawful access or processing and against accidental loss, destruction or damage.

The measures include:

- encryption
- monitoring, auditing and reporting
- backups
- anti-virus and anti-malware solutions
- awareness and training programmes
- physical and logical security
- firewalls
- disaster recovery plans
- intrusion prevention systems
- information security policies and procedures

- operator agreements
- secure communications
- retention and disposal of information
- governance and regulatory policies
- monitoring access and usage of personal information
- investigating and reacting to security incidents and/or breaches

## 11. AVAILABILITY OF THE MANUAL

- 11.1 A copy of the Manual is available-
  - 11.1.1 on [www.sgs.com/en-za](http://www.sgs.com/en-za)
  - 11.1.2 at Country club estate building 9, 21 Woodlands drive, Woodmead, Gauteng, for public inspection during normal business hours;
  - 11.1.3 any person upon request and upon the payment of a reasonable prescribed fee; and
  - 11.1.4 to the Information Regulator upon request.
- 11.2 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.

## 12. UPDATING OF THE MANUAL

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

### *Issued by*



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Mr. Gerald van Aswegen  
Managing Director