

Date of Compilation: 26 September 2025

PROMOTION OF ACCESS TO INFORMATION MANUAL

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1. LIST OF ACRONYMS AND DEFINITIONS

Acronyms:

- **PAIA** – Promotion of Access to Information Act, No. 2 of 2000 (as amended)
- **POPIA** – Protection of Personal Information Act, No. 4 of 2013

Definitions:

- **Employee:** A person who is, was, or is to be employed by the Company on a permanent, temporary, contractual or part-time basis, and who performs duties in exchange for remuneration.
 - **Company:** A Fick Sementwerke CC (referred to as Fick Sementwerke for compliance purposes).
 - **Parties:** The Company and the Employee.
 - **Confidential Information:** Information belonging to the Company or its clients, including technical, business, marketing, and strategic data deemed confidential.
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2. PURPOSE OF PAIA MANUAL

This Manual is designed to assist the public with:

- Understand available records and how to request access.
 - Access contact details for assistance.
 - Understand available remedies.
 - Learn about the Company's services.
 - Access the Regulator's Guide on PAIA.
 - Understand the processing of personal information.
 - Know whether information is transferred outside of South Africa.
 - Understand the Company's data security practices.
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3. ESTABLISHMENT OF FICK SEMENTWERKE CC

- **Established Under:** Close Corporation Act
 - **Registration Number:** 1995/055927/23
 - **Mandate:** Manufacturer and distributor of high-quality cement products.
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4. STRUCTURE AND FUNCTIONS

4.1 Organizational Structure

- **Director:** A Fick

4.2 Core Functions

- Manufacturer of masonry products
 - Supplier of sand and stone
 - Sales and customer support
 - Compliance and sustainability
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5. KEY CONTACT DETAILS

5.1 Chief Information Officer

- **Name:** Anton Fick
- **Tel:** +27 22 913 1921
- **Email:** anton@afsw.co.za

5.2 Deputy Information Officer

- **Name:** Geraldine Grobler
- **Tel:** +27 22 913 1921
- **Email:** hr@afsw.co.za

5.2 Deputy Information Officer

- **Name:** Felecia Paulissen
- **Tel:** +27 22 913 1921
- **Email:** felecia@afsw.co.za

5.3 Address

- **Postal:** PO Box 444, Piketberg, 7320
 - **Physical:** 5 Single Street, Piketberg
 - **Website:** www.ficksementwerke.co.za
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6. REMEDIES AVAILABLE

If a request for access to a record is refused, the requester may seek internal resolution through the Information Officer.

Should the Information Officer grant access, such access must be provided within 30 days of the decision.

If access is refused, and the requester is not satisfied with the outcome of the internal resolution process, the requester may:

- Lodge a complaint with the Information Regulator in terms of the Promotion of Access to Information Act (PAIA) and the Protection of Personal Information Act (POPIA); or
 - Approach a court of competent jurisdiction for appropriate relief.
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7. GUIDE ON HOW TO USE PAIA

Who May Request Information?

Any person (natural or juristic) may request information held by a public or private body, as long as:

- The information is required to exercise or protect a right; and
- The requester complies with the procedural requirements set out in PAIA.

Making a PAIA Request:

Step 1: Identify the information

- Determine the specific record or document you need access to.

Step 2: Complete the prescribed form

- Use Form C (for private bodies) or Form A (for public bodies) — available on the website of the Information Regulator:
<https://inforegulator.org.za>

Step 3: Submit the form

- Send the completed form to the Information Officer, along with the required request fee (if applicable).

Step 4: Wait for a response

- The Information Officer must respond within 30 days, indicating whether access is granted or refused.
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8. SUBJECTS AND CATEGORIES OF RECORDS HELD

Categories	Records
Strategic Documents	Annual Reports, Strategic Plans
Human Resources Director Potential Employees Employees	Employee Application form, CVs, Confidentiality form, Training Records, Payroll Records, employee performance, disciplinary procedures, Contracts, Certificates, Licenses, Confidentiality Agreement or any other records generated by or within Fick Sementwerke, Biometric logs.
Client – Juristic person / Entities Services / Operations	Company registration details, Credit Application, CIPC document, Income tax, VAT registration document, BEE certificates, Trade Reference documents, Bank accounts, Credit notes, Quotations, Contractual agreements, Correspondence and Product preference, Delivery Log, Recorded phone calls, CCTV footage.
Client – Natural person Services / Operations	Cash Application, Bank accounts, Invoices, Credit notes, Quotations, Contractual agreements, correspondence, product preferences, Delivery Logs, Recorded phone calls, and CCTV footage.
Consultant/Subcontractors	Records depend on the consultant or contractor's nature, may include any details under the “Human Resources” or “Service Providers” categories.
Service Providers, including outsourced services.	BEE certificates, Payment details including bank accounts, Invoices, Quotations, Sale agreement or Purchase invoice or any other records that a third party has provided either directly or indirectly and documents generated by or within Fick Sementwerke.

9. RECORDS AVAILABLE WITHOUT FORMAL REQUEST

Category	Document Type	Website	Upon Request
Company Overview	Product information	✓	✓
Compliance	Product Test Results		✓
Contact Details	Office information	✓	✓
Privacy Policy	POPIA & PAIA Compliance	✓	✓

10. SERVICES AVAILABLE TO THE PUBLIC

- Product supply
- Pricing and technical support
- Employment opportunities

Access: Phone, email, website, walk-in

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11. PUBLIC INVOLVEMENT

- Facebook and WhatsApp groups
- Email and phone

12. PROCESSING OF PERSONAL INFORMATION

12.1 Purpose

The processing of personal information is conducted to effectively manage employment relationships, maintain customer and supplier interactions, and ensure compliance with applicable legal and regulatory obligations.

12.2 Data Categories

Data Categories	Information Collected
Human Resources Director Potential Employees Employees	ID, Passport number, Contact details, Physical and Postal address, Date of birth, Age, Marital status, Race, Disability status, Nationality, Employment history, Criminal checks, Education history, Banking details, Income tax reference number, Remuneration and benefit information, biometrics (face and fingerprints).
Client – Juristic person / Entities Services / Operations	ID, Full names of the Contact and authorized person, contact details, Physical, postal and delivery address, recorded phone calls, CCTV footage, and Authorized Signatures.
Client – Natural person Services / Operations	ID, Full names of the Contact and authorized person, contact details, physical postal and delivery address, recorded phone calls, CCTV footage, Authorized Signatures
Consultant/Subcontractors	Personal Information, dependent on the consultant or contractor's nature, may include any details under the "Human Resources" or "Service Providers" categories.
Service Providers, including outsourced services.	ID, Full names of Contact person, addresses, contact details or any other information that a third party has provided to Fick Sementwerke either directly or indirectly and records generated by or within Fick Sementwerke.
General	Any person who voluntarily provides their personal information, whether by email or by entering our office, manufacturing plant, or parking area, does so with the understanding that such information may be collected and processed under our privacy policies and applicable data protection laws.

12.3 Information Sharing

Information Type	Shared With	Purpose
Personal Identifiable Information	Government departments, SAPD	Regulatory compliance, verification, audit
Employment Records	Department of Labor, SARS, UIF, Auditors	Regulatory compliance, audit
Client	Auditors, SARS	Financial reporting, tax compliance, operational and audit
Consultant/Subcontractors Service Providers, including outsourced services.	Financial institutions, Auditors, SARS	Payments, contracts, audit, operational and regulatory compliance

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IT and System Logs	IT service providers, cybersecurity partners	System security, technical support and data breach response
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12.3.1 LIST OF APPLICABLE LEGISLATION

- Basic Conditions of the Employment Act
- Occupational Health and Safety
- Unemployment Insurance Fund Act
- Protection of Personal Information Act
- Promotion of Access to Information Act
- SABS standards
- Income TAX Act
- VAT Act
- Close Corporation Act
- Occupational Health and Safety Act (OHSA)

12.4 Transborder Flows

- We do not ordinarily transfer personal data across national borders. However, if such transfers become necessary, for example, to trusted service providers or systems located abroad, we will ensure that appropriate safeguards are in place. These may include contractual obligations, data protection agreements, and compliance with applicable data privacy laws to ensure that personal information remains protected to a standard comparable to that required within our jurisdiction.

12.5 Security Measures

- Firewalls, encryption
- Access controls
- Staff training
- Self-audits

12.6 Confidentiality

- Employees are bound by contracts to protect sensitive and personal data.
- Disciplinary action for violations.
- Confidentiality Agreement.

12.7 Biometric and Surveillance Data

- Clock-in systems (face/fingerprint recognition)
- 24/7 CCTV on premises

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13. AVAILABILITY OF THE MANUAL

- Website
- This Manual is available for inspection by the general public upon request, during office hours and free of charge, at the offices of Fick Sementwerke. Copies of the Manual may be made, subject to a fee.
- Information Regulator

Languages: English

14. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS

Fick Sementwerke may refuse a request for information on the following grounds:

- Where disclosure would unreasonably reveal personal information, thereby infringing on the mandatory protection of a third party's privacy, particularly if the individual is a natural person.
- Where the information constitutes confidential third-party data protected under an agreement.
- Where disclosure could compromise the safety of individuals or the security of their property.
- Where the records are subject to legal privilege and therefore protected from disclosure in legal proceedings.

Commercial Activities may include:

- Trade secrets
- Financial, commercial, scientific or technical information, the disclosure of which could reasonably be expected to harm the financial or commercial interests of Fick Sementwerke.

Mandatory Protection of Third-Party Commercial Information:

Protection must be provided if a record contains:

- Financial, commercial, scientific or technical information belonging to a third party, where disclosure could reasonably be expected to harm that party's financial or commercial interests.

15. UPDATING OF THE MANUAL

Reviewed annually or as legislation changes. Includes updates to POPIA, employment compliance and data protection procedures.

Issued by:

Geraldine Grobler

Deputy Information Officer

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