
Prepared in terms of the Protection of Personal Information Act (POPIA), No. 4 of 2013 and the Promotion of Access to Information Act (PAIA), No. 2 of 2000

PART A: POPIA COMPLIANCE

1.1 INTRODUCTION AND OVERVIEW

This manual is prepared for the business operations of a **Building Contractor and Gas Installation service provider** operating within the Republic of South Africa. It applies to all personal and project-related information collected in the course of conducting construction, renovation, maintenance, and gas installation services. This manual outline how personal information is collected, used, stored, shared, and protected in accordance with the Protection of Personal Information Act (POPIA) and the Promotion of Access to Information Act (PAIA). The business is committed to protecting clients' and third parties' personal information and ensuring transparent access to information as prescribed by law.

1.2 WHAT INFORMATION IS COLLECTED?

The company collects the following types of personal information from clients, employees, subcontractors, and suppliers:

- Full name and surname
- Contact details (telephone number, email address)
- Identity number or company registration number
- Residential or business physical address
- VAT number and tax information (if applicable)
- Project location and site details
- Plans, permits, and compliance certificates
- Employment records and contractor credentials
- Banking details (for invoicing or payments)
- Any other information voluntarily supplied in the course of service delivery

1.3 PURPOSE FOR COLLECTING PERSONAL INFORMATION

Personal and project-related information is collected for the following reasons:

- To prepare quotes, estimates, and invoices
- To manage building and installation projects
- To comply with health, safety, and municipal regulations
- To communicate with clients and service providers
- To meet contractual, legal, and tax obligations
- To ensure safety and regulatory compliance with gas installations (as per SANS and Department of Labour requirements)
- For employment and subcontractor management purposes

1.4 DATA STORAGE AND SECURITY

All personal data is stored securely, whether electronically or in physical format, and protected through:

- Password-protected software and cloud platforms
- Secure physical storage (e.g., locked cabinets or safes)
- Regular backups and system updates
- Access control measures to prevent unauthorised access

Data is retained only for as long as necessary for operational, contractual, or legal purposes.

2. PURPOSE OF DATA PROCESSING

The company processes personal data for the following purposes:

- **Project Management:** To manage day-to-day construction and gas installation services
- **Legal Compliance:** To meet regulatory requirements including building permits, safety certificates, and SARS compliance
- **Communication:** To liaise with clients, suppliers, subcontractors, and government authorities
- **Record Keeping:** For business continuity, insurance, and legal record purposes

3. PRIVACY PRINCIPLES

The company abides by the following POPIA principles:

- **Accountability**
- **Processing Limitation**
- **Purpose Specification**
- **Further Processing Limitation**
- **Information Quality**
- **Openness**
- **Security Safeguards**
- **Data Subject Participation**

4. WEBSITE AND ELECTRONIC DATA COLLECTION

If the business website or online forms are used to collect personal data (e.g., for quote requests, booking appointments), the following protections are in place:

- Use of SSL encryption and secure forms
- Storage of submitted data in protected cloud systems
- Consent is obtained prior to data submission

5. DATA BREACH POLICY

In the event of a data breach, the following steps will be followed:

- Investigate the extent and nature of the breach
- Contain and mitigate risks
- Notify affected parties and the Information Regulator, if necessary
- Record the incident and implement corrective measures

6. DEFINITIONS

- **Personal Information:** Any information relating to an identifiable, living person or a juristic person (e.g., company)
- **Processing:** Any operation concerning personal information including collection, use, storage, transfer, or destruction
- **Data Subject:** The individual or business whose information is being processed
- **Responsible Party:** The business that determines how and why personal information is processed
- **Operator:** A third-party processing personal data on behalf of the Responsible Party (e.g., payroll company)
- **Record:** Any recorded information regardless of medium
- **Consent:** Voluntary, informed, and specific permission to process personal data
- **Information Officer:** The person appointed to oversee compliance with POPIA and PAIA (usually the business owner or director)
- **Requester:** Any individual requesting access to a record in terms of PAIA
- **Security Compromise/Data Breach:** Unauthorised access to or disclosure of personal data

7. DATA COLLECTION, USAGE AND SHARING

- **Purpose Limitation:** Only collect what is necessary for the purpose at hand
- **Consent:** Obtain informed consent where required
- **Legal Basis:** Data is processed in compliance with laws and industry standards
- **Minimisation:** Data collected is relevant and limited
- **Third Parties:** Data shared with subcontractors, consultants, or government bodies is governed by strict confidentiality and compliance requirements

8. SECURITY MEASURES

- **Physical and Electronic Security:** All physical records are kept in locked filing cabinets or secure storage rooms. Electronic data is stored on password-protected and encrypted systems.
- **Access Control:** Access to personal and project-related data is limited to authorised employees and subcontractors who have signed confidentiality agreements.
- **Incident Response:** In the event of a data breach, the business will:
 - Investigate and assess the nature and scope of the breach
 - Contain and secure the data
 - Notify affected parties and the Information Regulator if necessary
 - Implement corrective action and reinforce data protection protocols

PART B: PAIA COMPLIANCE

9. PURPOSE OF THE PAIA ACT

The purpose of the Promotion of Access to Information Act (PAIA) is to:

- Promote transparency, accountability, and good governance within public and private bodies
- Enable individuals to access information that is required to exercise or protect their rights
- Balance the right of access with the need to protect personal privacy, commercial confidentiality, and effective business operations

10. CONTACT DETAILS

This manual applies to the operations of the business listed below:

- **Name:** Phillip van Aswegen
- **Designation:** Information Officer
- **Business Name:** Judea Gas & Construction
- **Email Address:** info@judeagas.co.za
- **Phone Number:** 083 376 9478
- **Physical Address:** Wellington, Western Cape

This manual will be reviewed and updated as necessary to ensure ongoing compliance with POPIA and PAIA.

11. INFORMATION OFFICER

In accordance with POPIA and PAIA, the **Information Officer** is responsible for:

- Receiving and evaluating requests for access to records under PAIA
- Overseeing the implementation of privacy measures as required by POPIA
- Conducting regular internal reviews of data processing and protection practices
- Ensuring that employees and third-party service providers adhere to data protection policies

Deputy Information Officers may be appointed if necessary.

12. INFORMATION REGULATOR CONTACT DETAILS

- **Regulator:** The Information Regulator (South Africa)
- **Website:** <https://www.justice.gov.za/infoereg/>
- **Email:** infoereg@justice.gov.za
- **Telephone:** +27 (0)10 023 5200
- **Physical Address:** JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

13. RECIPIENTS OF PERSONAL INFORMATION

Personal information may be shared, where necessary and appropriate, with:

- Suppliers and subcontractors directly involved in the execution of a project
- Municipal and regulatory authorities (e.g., for building plan approvals or gas compliance certification)
- Legal and financial advisors, only if required by law
- External service providers (e.g., accountants, tax consultants), under strict confidentiality agreements

14. CATEGORIES OF RECORDS AVAILABLE ON REQUEST

(Section 51(1)(e))

- **Financial Records:** Tax records, invoices, receipts, bank statements
- **Employee/Subcontractor Records:** Contracts, time sheets, payroll records, safety certifications
- **Project Records:** Quotations, site plans, client contracts, completion certificates
- **Compliance Records:** Building and gas compliance documentation, occupational health and safety records
- **IT & Security Logs:** Data security policy, login records (if applicable)
- **Legal and Statutory Documents:** Company registration, COID compliance, insurance documents

15. ACCESS TO RECORDS

- Publicly accessible records (e.g., information on the company website or brochures) may be accessed without a formal PAIA request.
- Confidential or private records will only be made available:
 - Upon formal request in accordance with PAIA procedures
 - If the requester has a legitimate legal or contractual interest in the information
 - If disclosure is required or permitted by law

16. DESCRIPTION OF RECORDS AVAILABLE UNDER LEGISLATION

(Section 51(1)(d))

All records are maintained in compliance with legislation such as:

- The Companies Act
- The Tax Administration Act
- The Occupational Health and Safety Act
- The National Building Regulations and Building Standards Act
- The Pressure Equipment Regulations under the Occupational Health and Safety Act (for gas installations)
- POPIA and PAIA

Records may be inspected by regulators or other parties as authorised by these laws.

17. HOW TO REQUEST ACCESS TO A RECORD

To request access to a record under PAIA:

- Request the information with prescribe form.
- Provide sufficient detail to identify the record and the requester
- A **prescribed request fee** may apply depending on the type of information requested