



PAIA and POPIA Manual

This manual was prepared in accordance with section 51 of the Promotion of Access to Information Act, 2000 and to address requirements of the Protection of Personal Information Act, 2013.

This manual applies to

Focus Stationery and Computer Centre cc

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Contents

Contents.....	2
1. Background to the Promotion of Access to Information Act.....	3
2. Focus Stationery and Computer Centre cc	3
3. Purpose of the PAIA Manual	3
4. Contact Details of the Managing Director [Section 51(1)(a)]	4
5. The Information Officer [Section 51(1)(b)]	4
6. Guide of Information Registrar (Section 51(1) (b)).....	5
7. The Latest Notice in Terms of Section 52(2) (if any)[Section 51(1)(c)]	5
8. Subjects and Categories of Records Available only on Request to Access in Terms of the Act (Section 51(1) (e))	6
9. Records Available without a Request to Access in terms of the Act	8
10. Description of the Records of the Body Which are Available in Accordance with any other Legislation (Section 51(1) (d)).....	9
11. Detail to Facilitate a Request for Access to a Record of Focus Stationery and Computer Centre (Section 51(1) (e)).....	10
12. Refusal of Access to Records	11
13. Remedies Available When Focus Stationery and Computer Centre Refuses a Request.....	12
14. Access to Records Held by Focus Stationery and Computer Centre	14
15. Prescribed Fees (Section 51 (1) (f))	15
16. Reproduction Fee.....	15
17. Decision	17
18. Protection of Personal Information that is Processed by Focus Stationery and Computer Centre	17
19. Availability and Updating of the PAIA Manual	21
Appendix 1: Access Request Form.....	22
Appendix 2: Part 1 - Processing of Personal Information in Accordance with POPI	28
Appendix 2: Part 2 - Categories of Data Subjects and Categories of Personal Information relating thereto	30
Appendix 2: Part 3 - Recipients of Personal Information	31
Appendix 2: Part 4 – Cross border transfers of Personal Information	31
Appendix 2: Part 5 – Description of information security measures.....	31
Business Continuity Policy	35
Information Security Policy;	35
Computer network user access control	35
Appendix 3: Objection to the Processing of Personal Information in terms of Section 11(3) of the Protection of Personal Information Act, 2013	36
Appendix 4: Request for Correction or Deletion of Personal Information or Destroying or Deletion of Record of Personal Information in terms of Section 24(1) of the Protection of Personal Information Act, 2013	37



1. Background to the Promotion of Access to Information Act

- 1.1. The Promotion of Access to Information Act, No. 2 of 2000 (the “Act”) was enacted on 3 February 2000, giving effect to the constitutional right in terms of section 32 of the Bill of Rights contained in the Constitution of the Republic of South Africa 108 of 1996 (the “Constitution”) of access to any information held by the state and any information that is held by another person and that is required for the exercise or protection of any rights.
- 1.2. In terms of section 51 of the Act, all Private Bodies are required to compile an Information Manual (“PAIA Manual”).
- 1.3. Where a request is made in terms of the Act, the body to whom the request is made is obliged to release the information, subject to applicable legislative and / or regulatory requirements, except where the Act expressly provides that the information may be adopted when requesting information from a public or private body.

2. Focus Stationery and Computer Centre cc

- 2.1. Focus Stationery and Computer Centre cc is a IT, Stationery and office Supply business that services corporate, government and private clients.
- 2.2. This PAIA Manual of Focus Stationery and Computer Centre is available at our premises: Unit 1, 12 Gordon Road, Bertrams, Johannesburg, as well as on our website, <https://focussa.co.za>.

3. Purpose of the PAIA Manual

- 3.1. The purpose of PAIA is to promote the right of access to information, to foster a culture of transparency and accountability within Focus Stationery and Computer Centre by giving the right to information that is required for the exercise or protection of any right and to actively promote a society in which the people of South Africa have effective access to information to enable them to exercise and protect their rights.
- 3.2. In order to promote effective governance of natural or juristic persons, it is necessary to ensure that everyone is empowered and educated to understand their rights in relation to public and private bodies.
- 3.3. Section 9 of the Act recognises that the right to access information cannot be unlimited and should be subject to justifiable limitations, including, but not limited to:
 - 3.3.1. Limitations aimed at the reasonable protection of privacy;
 - 3.3.2. Commercial confidentiality; and
 - 3.3.3. Effective, efficient and good governance;

and in a manner which balances that right with any other rights, including such rights contained in the Bill of Rights in the Constitution.

- 3.4. This PAIA Manual complies with the requirements of guide mentioned in section 10 of the Act and recognises that upon commencement of the Protection of Personal Information Act 4 of 2013, that the appointed Information Regulator will be responsible to regulate compliance with the Act and its regulations by private and public bodies.

4. Contact Details of the Managing Director [Section 51(1)(a)]

Managing Director:	Mr Megandran Naicker
Registered Address:	Unit 1, 12 Gordon Road, Bertrams, Johannesburg
Postal Address:	P O Box 53587, Troyeville, 2139
Telephone Number:	011 474 4657
Website:	https://focussa.co.za

5. The Information Officer [Section 51(1)(b)]

- 5.1. The Act prescribes the appointment of an Information Officer for public bodies where such Information Officer is responsible to, inter alia, assess request for access to information. The head of a private body fulfils such a function in terms of section 51. Focus Stationery and Computer Centre has opted to appoint an Information Officer to assess such a request for access to information as well as to oversee its required functions in terms of the Act.
- 5.2. The Information Officer appointed in terms of the Act also refers to the Information Officer as referred to in the Protection of Personal Information Act 4 of 2013. The Information Officer oversees the functions and responsibilities as required for in terms of both this Act as well as the duties and responsibilities in terms of section 55 of the Protection of Personal Information Act 4 of 2013 after registering with the Information Regulator.
- 5.3. The Information Officer may appoint, where it is deemed necessary, Deputy Information Officers, as allowed in terms of section 17 of the Act as well as section 56 of the Protection of Personal Information Act 4 of 2013. This is in order to render Focus Stationery and Computer Centre as accessible as reasonable possible for requesters of its records and to ensure fulfilment of its obligations and responsibilities as prescribed in terms of section 55 of the Protection of Personal Information Act 4 of 2013. All request for information in terms of this Act must be addressed to the Information Officer.

Contact Details of the Information Officer

Information Officer:	Seelan Naicker
Physical Address:	Unit 1, 12 Gordon Road, Bertrams, Johannesburg
Telephone Number:	011 474 4657
Email:	seelan@focussa.co.za

6. Guide of Information Registrar (Section 51(1) (b))

- 6.1. The ACT grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest.
- 6.2. Requests in terms of the ACT shall be made in accordance with the prescribed procedures, at the rates provided. The forms and tariff are dealt with in paragraphs 6 and 7 of the Act.
- 6.3. Requesters are referred to the Guide in terms of Section 10 which has been compiled by the Information Registrar, which will contain information for the purposes of exercising Constitutional Rights.
- 6.4. The contact details of the Commission are:

Contact body:	The Information Regulator (South Africa)
Physical Address:	JD House 27 Stiemens Street Braamfontein Johannesburg, 2001
Postal Address:	P.O Box 31533, Braamfontein, Johannesburg, 2017
Telephone Number:	
E-Mail:	complaints.IR@justice.gov.za ; infoereg@justice.gov.za
Web Site:	https://www.justice.gov.za

7. The Latest Notice in Terms of Section 52(2) (if any)[Section 51(1)(c)]

No notice has been published on the categories of records that are automatically available without a person having to request access in terms of Section 52(2) of PAIA.



8. Subjects and Categories of Records Available only on Request to Access in Terms of the Act (Section 51(1) (e))

8.1. Records held by Focus Stationery and Computer Centre

For the purposes of this clause 8.1, “Personnel” refers to any person who works for, or provides services to, or on behalf of Focus Stationery and Computer Centre and receives or is entitled to receive remuneration and any other person who assist in carrying out or conducting the business of Focus Stationery and Computer Centre. This includes, without limitation, directors (executive and non-executive), all permanent, temporary and part-time staff, as well as contract workers.

This clause serves as a reference to the categories of information that Focus Stationery and Computer Centre holds. The information is classified and grouped according to records relating to the following subjects and categories:

Subject	Category
Companies Act Records	All trust deeds; Documents of Incorporation; Index of names of Directors; Memorandum of Incorporation; Minutes of meetings of the Board of Directors; Minutes of meetings of Shareholders; Proxy forms; Register of debenture-holders; Register of directors' shareholdings; Share certificates; Share Register and other statutory registers and/or records and/or documents; Special resolutions/Resolutions passed at General and Class meetings; Records relating to the appointment of: Auditors; Directors; Prescribed Officer. Public Officer; and Secretary
Financial Records	Accounting Records; Annual Financial Reports; Annual Financial Statements Asset Registers; Bank Statements; Banking details and bank accounts;



	Banking Records; Debtors / Creditors statements and invoices; General ledgers and subsidiary ledgers; General reconciliation; Invoices; Paid Cheques; Policies and procedures; Rental Agreements; and Tax Returns
Income Tax Records	PAYE Records; Documents issued to employees for income tax purposes; Records of payments made to SARS on behalf of employees; All other statutory compliances: VAT Regional Services Levies Skills Development Levies UIF Workmen's Compensation
Personnel Documents And Records	Accident books and records; Address Lists; Disciplinary Code and Records; Employee benefits arrangements rules and records; Employment Contracts; Employment Equity Plan Forms and Applications; Grievance Procedures; Leave Records; Medical Aid Records; Payroll reports/ Wage register; Pension Fund Records; Safety, Health and Environmental records; Salary Records; SETA records Standard letters and notices Training Manuals; Training Records; Workplace and Union agreements and records.
Procurement Department	Standard Terms and Conditions for supply of services and products; Contractor, client and supplier agreements; Lists of suppliers, products, services and distribution; and Policies and Procedures.

Sales Department	Customer details Credit application information Information and records provided by a third party
Marketing Department	Advertising and promotional material
Risk Management and Audit	Audit reports; Risk management frameworks; and Risk management plans.
Safety, Health and Environment	Complete Safety, Health and Environment Risk Assessment Environmental Managements Plans Inquiries, inspections, examinations by environmental authorities
Information Technology	Computer / mobile device usage policy documentation; Disaster recovery plans; Hardware asset registers; Information security policies/standards/procedures; Information technology systems and user manuals Information usage policy documentation; Project implementation plans; Software licensing; and System documentation and manuals.
Corporate Social Responsibility (CSR)	CSR schedule of projects/record of organisations that receive funding; Reports, books, publications and general information related to CSR spend; Records and contracts of agreement with funded organisations.

- 8.2. Note that the accessibility of the records may be subject to the grounds of refusal set out in this PAIA manual. Amongst other, records deemed confidential on the part of a third party, will necessitate permission from the third party concerned, in addition to normal requirements, before Focus Stationery and Computer Centre will consider access.

9. Records Available without a Request to Access in terms of the Act

- 9.1. Records of a public nature, typically those disclosed on the Focus Stationery and Computer Centre website and in its various annual reports, may be accessed without the need to submit a formal application.
- 9.2. Other non-confidential records, such as statutory records maintained at CIPC, may also be accessed without the need to submit a formal application, however, please note that an appointment to view such records will still have to be made with the Information Officer.

10. Description of the Records of the Body Which are Available in Accordance with any other Legislation (Section 51(1) (d))

- 10.1. Where applicable to its operations, Focus Stationery and Computer Centre also retains records and documents in terms of the legislation below. Unless disclosure is prohibited in terms of legislation, regulations, contractual agreement or otherwise, records that are required to be made available in terms of these acts shall be made available for inspection by interested parties in terms of the requirements and conditions of the Act; the below mentioned legislation and applicable internal policies and procedures, should such interested parties be entitled to such information. A request to access must be done in accordance with the prescriptions of the Act.
- a. Auditing Professions Act, No 26 of 2005;
 - b. Basic Conditions of Employment Act, No 75 of 1997;
 - c. Broad- Based Black Economic Empowerment Act, No 75 of 1997;
 - d. Business Act, No 71 of 1991;
 - e. Companies Act, No 71 of 2008;
 - f. Compensation for Occupational Injuries & Diseases Act, 130 of 1993;
 - g. Competition Act, No.71 of 2008;
 - h. Constitution of the Republic of South Africa 2008;
 - i. Copyright Act, No 98 of 1978;
 - j. Customs & Excise Act, 91 of 1964;
 - k. Electronic Communications Act, No 36 of 2005;
 - l. Electronic Communications and Transactions Act, No 25 of 2002;
 - m. Employment Equity Act, No 55 of 1998;
 - n. Financial Intelligence Centre Act, No 38 of 2001;
 - o. Identification Act, No. 68 of 1997;
 - p. Income Tax Act, No 58 of 1962;
 - q. Intellectual Property Laws Amendment Act, No 38 of 1997;
 - r. Labour Relations Act, No 66 of 1995;
 - s. Long Term Insurance Act, No 52 of 1998;
 - t. Occupational Health & Safety Act, No 85 of 1993;
 - u. Pension Funds Act, No 24 of 1956;
 - v. Prescription Act, No 68 of 1969;
 - w. Prevention of Organised Crime Act, No 121 of 1998;
 - x. Promotion of Access to Information Act, No 2 of 2000;
 - y. Protection of Personal Information Act, No. 4 of 2013;
 - z. Regulation of Interception of Communications and Provision of Communication-Related Information Act 70 of 2002



- aa. Revenue laws Second Amendment Act. No 61 of 2008;
 - bb. Skills Development Levies Act No. 9 of 1999;
 - cc. Short-term Insurance Act No. 53 of 1998;
 - dd. Trust Property Control Act 57 of 1988
 - ee. Unemployment Insurance Contributions Act 4 of 2002;
 - ff. Unemployment Insurance Act No. 30 of 1966;
 - gg. Value Added Tax Act 89 of 1991.
- 10.2. It is further recorded that the accessibility of documents and records may be subject to the grounds of refusal set out in this PAIA Manual.

11. Detail to Facilitate a Request for Access to a Record of Focus Stationery and Computer Centre (Section 51(1) (e))

- 11.1. The requester must comply with all the procedural requirements contained in the Act relating to the request for access to a record.
- 11.2. The requester must complete the prescribed form enclosed herewith, and submit same as well as payment of a request fee and a deposit (if applicable) to the Information Officer or the Deputy Information Officer at the postal or physical address, fax number or electronic mail address as noted in clause 5 above.
- 11.3. The prescribed form must be filled in with sufficient information to enable the Information Officer to identify:
 - a. the record or records requested; and
 - b. the identity of the requester.
- 11.4. The requester should indicate which form of access is required and specify a postal address or fax number of the requester in the Republic;
- 11.5. The requester must state that he/she requires the information in order to exercise or protect a right, and clearly state what the nature of the right is so to be exercised or protected. The requester must clearly specify why the record is necessary to exercise or protect such a right (section 53(2)(d)).



- 11.6. Focus Stationery and Computer Centre will process the request within 30 (thirty) days, unless the requester has stated special reasons to the satisfaction of the Information Officer that circumstances dictate that the above time periods not be complied with.
- 11.7. The requester shall be advised whether access is granted or denied in writing. If, in addition, the requester requires the reasons for the decision in any other manner, the requester will be obliged to state which manner and the particulars required.
- 11.8. If a request is made on behalf of another person, then the requester must submit proof of the capacity in which the requester is making the request to the reasonable satisfaction of the Information Officer (section 53(2)(f)).
- 11.9. If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally.
- 11.10. The requester must pay the prescribed fee, before any further processing can take place.
- 11.11. All information as listed in clause 11 herein should be provided and failing which the process will be delayed until the required information is provided. The prescribed time periods will not commence until the requester has furnished all the necessary and required information. The Information Officer shall sever a record, if possible, and grant only access to that portion requested and which is not prohibited from being disclosed.

12. Refusal of Access to Records

12.1. Grounds to Refuse Access

A private body such as Focus Stationery and Computer Centre is entitled to refuse a request for information.

12.1.1. The main grounds for Focus Stationery and Computer Centre to refuse a request for information relates to the:

- a. mandatory protection of the privacy of a third party who is a natural person or a deceased person (section 63) or a juristic person, as included in the Protection of Personal Information Act 4 of 2013, which would involve the unreasonable disclosure of personal information of that natural or juristic person;
- b. mandatory protection of personal information and for disclosure of any personal information to, in addition to any other legislative, regulatory or contractual agreements, comply with the provisions of the Protection of Personal Information Act 4 of 2013;
- c. mandatory protection of the commercial information of a third party (section 64) if the record contains:
 - i. trade secrets of the third party;
 - ii. financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party;



- iii. information disclosed in confidence by a third party to Focus Stationery and Computer Centre, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition;
 - d. mandatory protection of confidential information of third parties (section 65) if it is protected in terms of any agreement;
 - e. mandatory protection of the safety of individuals and the protection of property (section 66);
 - f. mandatory protection of records which would be regarded as privileged in legal proceedings (section 67).
- 12.1.2. The commercial activities (section 68) of a private body, such as Focus Stationery and Computer Centre, which may include:
- a. trade secrets of Focus Stationery and Computer Centre;
 - b. financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of Focus Stationery and Computer Centre;
 - c. information which, if disclosed could put Focus Stationery and Computer Centre at a
 - d. disadvantage in negotiations or commercial competition;
 - e. a computer program which is owned by Focus Stationery and Computer Centre, and which is protected by copyright;
 - f. the research information (section 69) of Focus Stationery and Computer Centre or a third party, if its disclosure would disclose the identity of Focus Stationery and Computer Centre, the researcher or the subject matter of the research and would place the research at a serious disadvantage.
- 12.1.3. Requests for information that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused.
- 12.1.4. All requests for information will be assessed on their own merits and in accordance with the applicable legal principles and legislation.
- 12.1.5. If a requested record cannot be found or if the record does not exist, the Information Officer shall, by way of an affidavit or affirmation, notify the requester that it is not possible to give access to the requested record. Such a notice will be regarded as a decision to refuse a request for access to the record concerned for the purpose of the Act. If the record should later be found, the requester shall be given access to the record in the manner stipulated by the requester in the prescribed form, unless the Information Officer refuses access to such record.

13. Remedies Available When Focus Stationery and Computer Centre Refuses a Request

13.1. Internal Remedies



Focus Stationery and Computer Centre does not have internal appeal procedures. The decision made by the Information Officer is final. Requesters will have to exercise such external remedies at their disposal if the request for information is refused, and the requestor is not satisfied with the answer supplied by the Information Officer.

13.2. External Remedies

- 13.2.1. A requestor that is dissatisfied with the Information Officer's refusal to disclose information, may within 30 (thirty) days of notification of the decision, may apply to a Court for relief.
- 13.2.2. A third party dissatisfied with the Information Officer's decision to grant a request for information, may within 30 (thirty) days of notification of the decision, apply to a Court for relief.

For purposes of the Act, the Courts that have jurisdiction over these applications are the Constitutional Court, the High Court or another court of similar status and a Magistrate's Court designated by the Minister of Justice and Constitutional Development and which is presided over by a designated Magistrate.

14. Access to Records Held by Focus Stationery and Computer Centre

14.1. Prerequisites for Access by Personal/Other Requester

- 14.1.1. Records held by Focus Stationery and Computer Centre may be accessed by requests only once the prerequisite requirements for access have been met.
- 14.1.2. A requester is any person making a request for access to a record of Focus Stationery and Computer Centre. There are two types of requesters:
 - a. Personal Requester
 - i. A personal requester is a requester who is seeking access to a record containing personal information about the requester.
 - ii. Focus Stationery and Computer Centre will voluntarily provide the requested information, or give access to any record with regard to the requester's personal information. The prescribed fee for reproduction of the information requested will be charged.
 - b. Other Requester
 - i. This requester (other than a personal requester) is entitled to request access to information on third parties.
 - ii. In considering such a request, Focus Stationery and Computer Centre will adhere to the provisions of the Act. Section 71 requires that the Information Officer take all reasonable steps to inform a third party to whom the requested record relates of the request, informing him/her that he/she may make a written or oral representation to the Information Officer why the request should be refused or, where required, give written consent for the disclosure of the Information.

Focus Stationery and Computer Centre is not obliged to voluntarily grant access to such records. The requester must fulfil the prerequisite requirements, in accordance with the requirements of the Act and as stipulated in Chapter 5; Part 3, including the payment of a request and access fee.



15. Prescribed Fees (Section 51 (1) (f))

15.1. Fees Provided by the Act

15.1.1. The Act provides for two types of fees, namely:

- a. A request fee, which is a form of administration fee to be paid by all requesters except personal requesters, before the request is considered and is not refundable; and
- b. An access fee, which is paid by all requesters in the event that a request for access is granted. This fee is inclusive of costs involved by the private body in obtaining and preparing a record for delivery to the requester.

15.1.2. When the request is received by the Information Officer, such officer shall by notice require the requester, other than a personal requester, to pay the prescribed request fee, before further processing of the request (section 54(1)).

15.1.3. If the search for the record has been made and the preparation of the record for disclosure, including arrangement to make it available in the requested form, requires more than the hours prescribed in the regulations for this purpose, the Information Officer shall notify the requester to pay as a deposit the prescribed portion of the access fee which would be payable if the request is granted.

15.1.4. The Information Officer shall withhold a record until the requester has paid the fees as indicated below.

15.1.5. A requester whose request for access to a record has been granted, must pay an access fee that is calculated to include, where applicable, the request fee, the process fee for reproduction and for search and preparation, and for any time reasonably required in excess of the prescribed hours to search for and prepare the record for disclosure including making arrangements to make it available in the request form.

15.1.6. If a deposit has been paid in respect of a request for access, which is refused, then the Information Officer concerned must repay the deposit to the requester.

16. Reproduction Fee

16.1. Where Focus Stationery and Computer Centre has voluntarily provided the Minister with a list of categories of records that will automatically be made available to any person requesting access thereto, the only charge that may be levied for obtaining such records, will be a fee for reproduction of the record in question.

Reproduction of Information Fees	Fees to be Charged
Information in an A-4 size page photocopy or part thereof	R 1,10
A printed copy of an A4-size page or part thereof	R 0,75
A copy in computer-readable format, for example: Compact disc	R 70,00
A transcription of visual images, in an A4-size page or part thereof	R 40,00
A copy of visual images	R 60,00
A transcription of an audio record for an A4-size page or part thereof	R 20,00
A copy of an audio record	R 30,00

16.2. Request Fees

Where a requester submits a request for access to information held by an institution on a person other than the requester himself/herself, a request fee in the amount of R50,00 is payable up-front before the institution will further process the request received.

16.3. Access Fees

- 16.3.1. An access fee is payable in all instances where a request for access to information is granted, except in those instances where payment of an access fee is specially excluded in terms of the Act or an exclusion is determined by the Minister in terms of section 54(8).

The applicable access fees which will be payable are:

Access of Information Fees	Fees to be Charged
Information in an A-4 size page photocopy or part thereof	R 1,10
A printed copy of an A4-size page or part thereof	R 0,75
A copy in computer-readable format, for example: Stiffy disc Compact disc	R 7,50 R 70,00
A transcription of visual images, in an A4-size page or part thereof	R 40,00
A copy of visual images	R 60,00
A transcription of an audio record for an A4-size page or part thereof	R 20,00
A copy of an audio record *Per hour or part of an hour reasonably required for such search.	R 30,00*



Where a copy of a record needs to be posted the actual postal fee is payable.

16.4. Deposits

16.4.1. Where the institution receives a request for access to information held on a person other than the requester himself/herself and the Information Officer upon receipt of the request is of the opinion that the preparation of the required record of disclosure will take more than 6 (six) hours, a deposit is payable by the requester.

16.4.2. The amount of the deposit is equal to 1/3 (one third) of the amount of the applicable access fee.

16.5. Collection Fees

16.5.1. The initial "request fee" of R50,00 should be deposited into the bank account below and a copy of the deposit slip, application form and other correspondence / documents, forwarded to the Information Officer via fax.

16.5.2. The officer will collect the initial "request fee" of applications received directly by the Information Officer via email.

16.5.3. All fees are subject to change as allowed for in the Act and as a consequence such escalations may not always be immediately available at the time of the request being made. Requesters shall be informed of any changes in the fees prior to making a payment.

17. Decision

17.1. Time Allowed to Institution

17.1.1. Focus Stationery and Computer Centre will, within 30 (thirty) days of receipt of the request, decide whether to grant or decline the request and give notice with reasons (if required) to that effect.

17.1.2. The 30 (thirty) day period within which Focus Stationery and Computer Centre has to decide whether to grant or refuse the request, may be extended for a further period of not more than (30) thirty days if the request is for a large number of information, or the request requires a search for information held at another office of Focus Stationery and Computer Centre and the information cannot reasonably be obtained within the original 30 (thirty) day period.

17.1.3. Focus Stationery and Computer Centre will notify the requester in writing should an extension be sought.

18. Protection of Personal Information that is Processed by Focus Stationery and Computer Centre

18.1. Chapter 3 of POPIA provides for the minimum Conditions for Lawful Processing of Personal Information by a Responsible Party. These conditions may not be derogated from unless specific exclusions apply as outlined in POPIA.



- 18.2. Focus Stationery and Computer Centre needs Personal Information relating to both individual and juristic persons in order to carry out its business and organisational functions. The manner in which this information is Processed and the purpose for which it is Processed is determined by Focus Stationery and Computer Centre. Focus Stationery and Computer Centre is accordingly a Responsible Party for the purposes of POPIA and will ensure that the Personal Information of a Data Subject:
- 18.2.1. is processed lawfully, fairly and transparently. This includes the provision of appropriate information to Data Subjects when their data is collected by Focus Stationery and Computer Centre, in the form of privacy or data collection notices. Focus Stationery and Computer Centre must also have a legal basis (for example, consent) to process Personal Information;
 - 18.2.2. is processed only for the purposes for which it was collected;
 - 18.2.3. will not be processed for a secondary purpose unless that processing is compatible with the original purpose.
 - 18.2.4. is adequate, relevant and not excessive for the purposes for which it was collected;
 - 18.2.5. is accurate and kept up to date;
 - 18.2.6. will not be kept for longer than necessary;
 - 18.2.7. is processed in accordance with integrity and confidentiality principles; this includes physical and organisational measures to ensure that Personal Information, in both physical and electronic form, are subject to an appropriate level of security when stored, used and communicated by Focus Stationery and Computer Centre, in order to protect against access and acquisition by unauthorised persons and accidental loss, destruction or damage;
 - 18.2.8. is processed in accordance with the rights of Data Subjects, where applicable. Data Subjects have the right to:
 - (a) be notified that their Personal Information is being collected by Focus Stationery and Computer Centre. The Data Subject also has the right to be notified in the event of a data breach;
 - (b) know whether Focus Stationery and Computer Centre holds Personal Information about them, and to access that information. Any request for information must be handled in accordance with the provisions of this Manual;
 - (c) request the correction or deletion of inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained personal information;
 - (d) object to Focus Stationery and Computer Centre's use of their Personal Information and request the deletion of such Personal Information (deletion would be subject to Focus Stationery and Computer Centre's record keeping requirements);
 - (e) object to the processing of Personal Information for purposes of direct marketing by means of unsolicited electronic communications; and



- (f) complain to the Information Regulator regarding an alleged infringement of any of the rights protected under POPI and to institute civil proceedings regarding the alleged non-compliance with the protection of his, her or its personal information.



18.3. Purpose of the Processing of Personal Information by the Company

As outlined above, Personal Information may only be processed for a specific purpose. The purposes for which Focus Stationery and Computer Centre processes or will process Personal Information is set out in Part 1 of Appendix 2.

18.4. Categories of Data Subjects and Personal Information/special Personal Information relating thereto

As per section 1 of POPI, a Data Subject may either be a natural or a juristic person. Part 2 of Appendix 2 sets out the various categories of Data Subjects that Focus Stationery and Computer Centre Processes Personal Information on and the types of Personal Information relating thereto.

18.5. Recipients of Personal Information

Part 3 of Appendix 2 outlines the recipients to whom Focus Stationery and Computer Centre may provide a Data Subjects Personal Information to.

18.6. Cross-border flows of Personal Information

18.6.1. Section 72 of POPIA provides that Personal Information may only be transferred out of the Republic of South Africa if the:

- a. recipient country can offer such data an “adequate level” of protection. This means that its data privacy laws must be substantially similar to the Conditions for Lawful Processing as contained in POPI; or
- b. Data Subject consents to the transfer of their Personal Information; or
- c. transfer is necessary for the performance of a contractual obligation between the Data Subject and the Responsible Party; or
- d. transfer is necessary for the performance of a contractual obligation between the Responsible Party and a third party, in the interests of the Data Subject; or
- e. the transfer is for the benefit of the Data Subject, and it is not reasonably practicable to obtain the consent of the Data Subject, and if it were, the Data Subject, would in all likelihood provide such consent.

18.6.2. Part 4 of Appendix 2 sets out the planned cross-border transfers of Personal Information and the condition from above that applies thereto.



18.7. *Description of information security measures to be implemented by Focus Stationery and Computer Centre*

Part 5 of Appendix 2 sets out the types of security measures to implemented by Focus Stationery and Computer Centre in order to ensure that Personal Information is respected and protected. A preliminary assessment of the suitability of the information security measures implemented or to be implemented by Focus Stationery and Computer Centre may be conducted in order to ensure that the Personal Information that is processed by Focus Stationery and Computer Centre is safeguarded and Processed in accordance with the Conditions for Lawful Processing.

18.8. *Objection to the Processing of Personal Information by a Data Subject*

Section 11 (3) of POPI and regulation 2 of the POPIA Regulations provides that a Data Subject may, at any time object to the Processing of his/her/its Personal Information in the prescribed form attached to this manual as Appendix 3 subject to exceptions contained in POPIA.

18.9. *Request for correction or deletion of Personal Information*

Section 24 of POPI and regulation 3 of the POPI Regulations provides that a Data Subject may request for their Personal Information to be corrected/deleted in the prescribed form attached as Appendix 4 to this Manual

19. Availability and Updating of the PAIA Manual

19.1. Regulation Number R.187 of 15 February 2002

19.1.1. This PAIA Manual is made available in terms of Regulation Number R.187 of 15 February 2002.

Focus Stationery and Computer Centre will update this PAIA Manual at such intervals as may be deemed necessary.

19.1.2. This PAIA Manual of Focus Stationery and Computer Centre is available to view at its premises and on its website.

Appendix 1: Access Request Form



J752

REPUBLIC OF SOUTH AFRICA

FORM C

REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

(Section 53(1) of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000))

[Regulation 10]

A. Particulars of private body

The Head:

--

B. Particulars of person requesting access to the record

- | |
|--|
| <p>(a) The particulars of the person who requests access to the record must be given below.</p> <p>(b) The address and/or fax number in the Republic to which the information is to be sent must be given.</p> <p>(c) Proof of the capacity in which the request is made, if applicable, must be attached.</p> |
|--|



Full names and surname:			
Identity number:			
Postal address:			
Telephone number:	()	Fax number:	()
E-mail address:			

Capacity in which request is made, when made on behalf of another person:

--

C. Particulars of person on whose behalf request is made

This section must be completed ONLY if a request for information is made on behalf of another person
--

Full names and surname:													
Identity number:													

D. Particulars of record

(a) 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.
(b) If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

1. Description of record or relevant part of the record:

--





2. Reference number, if available:

3. Any further particulars of record:

E. Fees

- (a) A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid.
- (b) You will be notified of the amount required to be paid as the request fee.
- (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 for exemption from payment of fees:



--

F. Form of access to record

If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 below, state your disability and indicate in which form the record is required.

Disability:		Form in which record is required:	
Mark the appropriate box with an X.			
<p>NOTES:</p> <p>(a) Compliance with your request for access in the specified form may depend on the form in which the record is available.</p> <p>(b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.</p> <p>(c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.</p>			

1. If the record is in written or printed form:					
	copy of record*		inspection of record		
2. If record consists of visual images - (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.):					
	view the images		copy of the images*		transcription of the images*
3. If record consists of recorded words or information which can be reproduced in sound:					
	listen to the soundtrack (audio cassette)		transcription of soundtrack* (written or printed document)		
4. If record is held on computer or in an electronic or machine-readable form:					
	printed copy of record*		printed copy of information derived from the record*		copy in computer readable form* (stiffy or compact disc)



*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable.	Yes	No
---	-----	----

G. Particulars of right to be exercised or protected

If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.
--

1. Indicate which right is to be exercised or protected:

--

2. Explain why the record requested is required for the exercise or protection of the aforementioned right:

--

H. Notice of decision regarding request for access

You will be notified in writing whether your request has been approved / denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.
--

How would you prefer to be informed of the decision regarding your request for access to the record?

--

Signed at this day of year.....

.....

Signature of Requester /

Person on Whose Behalf Request is Made



Appendix 2: Part 1 - Processing of Personal Information in Accordance with POPI

For consumers:

- a. Performing duties in terms of any agreement with consumers
- b. Make, or assist in making, credit decisions about consumers
- c. Operate and manage consumers' accounts and manage any application, agreement or correspondence consumers may have with Focus Stationery and Computer Centre
- d. Communicating (including direct marketing) with consumers by email, SMS, letter, telephone or in any other way about Focus Stationery and Computer Centre's products and services, unless consumers indicate otherwise
- e. To form a view of consumers as individuals and to identify, develop or improve products, that may be of interest to consumers
- f. Carrying out market research, business and statistical analysis
- g. Performing other administrative and operational purposes including the testing of systems
- h. Recovering any debt consumers may owe the Focus Stationery and Computer Centre
- i. Complying with the Focus Stationery and Computer Centre's regulatory and other obligations
- j. Any other reasonably required purpose relating to the Focus Stationery and Computer Centre business

For prospective consumers:

- a. Verifying and updating information
- b. Pre-scoring
- c. Direct marketing
- d. Any other reasonably required purpose relating to the processing of a prospect's personal information reasonably related to the Focus Stationery and Computer Centre's business.

For employees:

- a. The same purposes as for consumers (above)
- b. Verification of applicant employees' information during recruitment process
- c. General matters relating to employees:
 - i. Pension
 - ii. Medical aid
 - iii. Payroll
 - iv. Disciplinary action
 - v. Training
- d. Any other reasonably required purpose relating to the employment or possible employment relationship.





For vendors /suppliers /other businesses:

- a. Verifying information and performing checks;
- b. Purposes relating to the agreement or business relationship or possible agreement or business relationships between the parties;
- c. Payment of invoices;
- d. Complying with the Focus Stationery and Computer Centre's regulatory and other obligations; and
- e. Any other reasonably required purpose relating to the Focus Stationery and Computer Centre business.

Appendix 2: Part 2 - Categories of Data Subjects and Categories of Personal Information relating thereto

Employees

- a. Name and contact details
- b. Identity number and identity documents including passports
- c. Employment history and references
- d. Banking and financial details
- e. Details of payments to third parties (deductions from salary)
- f. Employment contracts
- g. Employment equity plans
- h. Medical aid records
- i. Pension Fund records
- j. Remuneration/salary records
- k. Performance appraisals
- l. Disciplinary records
- m. Leave records
- n. Training records

Consumers and prospective consumers (which may include employees)

- a. Postal and/or street address
- b. title and name
- c. contact numbers and/or e-mail address
- d. ethnic group
- e. employment history
- f. age
- g. gender
- h. marital status
- i. nationality
- j. language
- k. financial information



- l. identity or passport number
- m. browsing habits and click patterns on Focus Stationery and Computer Centre websites.

Vendors /suppliers /other businesses:

- a. Name and contact details
- b. Identity and/or company information and directors' information
- c. Banking and financial information
- d. Information about products or services
- e. Other information not specified, reasonably required to be processed for business operations

Appendix 2: Part 3 - Recipients of Personal Information

- a. Any firm, organisation or person that the Focus Stationery and Computer Centre uses to collect payments and recover debts or to provide a service on its behalf;
- b. Any firm, organisation or person that/who provides the Focus Stationery and Computer Centre with products or services;
- c. Any payment system the Focus Stationery and Computer Centre uses;
- d. Regulatory and governmental authorities or ombudsmen, or other authorities, including tax authorities, where Focus Stationery and Computer Centre has a duty to share information;
- e. Third parties to whom payments are made on behalf of employees;
- f. Financial institutions from whom payments are received on behalf of data subjects;
- g. Any other operator not specified;
- h. Employees, contractors and temporary staff; and
- i. Agents.

Appendix 2: Part 4 – Cross border transfers of Personal Information

Personal Information may be transmitted transborder to Focus Stationery and Computer Centre's suppliers in other countries, and Personal Information may be stored in data servers hosted outside South Africa, which may not have adequate data protection laws. Focus Stationery and Computer Centre will endeavour to ensure that its dealers and suppliers will make all reasonable efforts to secure said data and Personal Information.

Appendix 2: Part 5 – Description of information security measures

Focus Stationery and Computer Centre undertakes to institute and maintain the data protection measures to accomplish the following objectives outlined below. The details given are to be interpreted as examples of how to achieve an adequate data protection level for each objective. Focus Stationery and Computer Centre may



use alternative measures and adapt to technological security development, as needed, provided that the objectives are achieved.

Network Access Control of Persons

- Focus Stationery and Computer Centre shall maintain strict access on their servers through user access policies
All system components (i.e. applications like Microsoft Applications, Pastel, Fincon as well operating systems and network devices like computers) of the Focus shall require work with strict access control, Identity and Access Management Policy.
- Access needs is determined for each role of job function based upon:
 - Requirements for access to system components and information resources as required to be able to fulfil the requirements of that job;
 - The level of privilege required to fulfil the role or job function.
- User access to system components and information resources will be:
 - Assigned based on an individual's role or job function;
 - Restricted to the least privilege necessary to fulfil the role or job function;
 - Require documented authorisation from management which specifies the level of access and privilege required.
- All users of system components will be assigned a unique user ID (username.)
- All users of system components will require a password in addition to the unique user ID.
- Group, shared or generic user IDs are prohibited. Usernames and passwords must never be shared.
- The default access privileges for user accounts will be to deny all access to system components and information resources unless specific privileges are authorised and granted.
- Management of user accounts (New employees/temps/and people that leave) shall require documented authorisation for all changes to user accounts:
 - All access to system components and information resources will be immediately terminated for users who have left Focus Stationery and Computer Centre;
 - All approval requests for access will be logged and are subject to an approval process.
- Focus Stationery and Computer Centre shall perform regular reviews on access requirements (groups, roles and privileges) to ensure it is appropriate to job roles and responsibilities.

Data Media and Portable Drive Control

Focus Stationery and Computer Centre has implemented no download policy to prevent the unauthorized manipulation of media, including reading, copying, alteration or removal of the data media used by Focus Stationery and Computer Centre and containing personal data of Customers.

User Control & Access Control to Data

- It is Focus Stationery and Computer Centre' policy to restrict access to systems and resources to legitimate users via means of a secure password.
- Focus Stationery and Computer Centre requirement for a password complexity of user accounts is as follows:
 - Are required to have a password length of at least 8 characters;
 - Are required to contain both alphabetic and numeric characters;
 - Are required to contain at least one capital letter;
 - Are required to contain at least one special character;



- Cannot use a password which is the same as any of the previous 4 passwords used;
- Inactive user accounts will be disabled after no more than 90 days of inactivity, unless authorised by management where the retention of such accounts is required for operational purposes;
- Password credentials:
 - Should not be dictionary-based;
 - Should not be shared with other user accounts on other systems;
 - Should not contain any personally identifiable information (eg. names of family members or pets, dates of birth, etc.)
 - Should not be shared with anybody for any reason;
 - Should not be committed to hardcopy;

Password Control

It is Focus Stationery and Computer Centre' policy to restrict access to systems and resources to legitimate users via means of a secure password.

- Focus Stationery and Computer Centre requirement for a password complexity of user accounts is as follows:
 - Are required to have a password length of at least 8 characters;
 - Are required to contain both alphabetic and numeric characters;
 - Are required to contain at least one capital letter;
 - Are required to contain at least one special character;
 - Cannot use a password which is the same as any of the previous 4 passwords used;
- Inactive user accounts will be disabled after no more than 90 days of inactivity, unless authorised by management where the retention of such accounts is required for operational purposes;
- Password credentials:
 - Should not be dictionary-based;
 - Should not be shared with other user accounts on other systems;
 - Should not contain any personally identifiable information (eg. names of family members or pets, dates of birth, etc.)
 - Should not be shared with anybody for any reason;
 - Should not be committed to hardcopy;

Antivirus Control

- Focus Stationery and Computer Centre shall maintain a good quality Anti Virus program to prevent hacking, ransom ware, and to serve as a firewall to the outside networks
Anti-virus software shall be deployed on all servers.
- Anti-virus shall be deployed on all staff member PC's.
- Anti-virus software will be capable of detecting, removing and protecting against all forms of malware.
- Anti-virus software will be configured to perform periodic scans.
- Anti-virus software will always be actively running.
- Anti-virus software cannot be disabled or altered by non-administrative users.

Data Retention Control

Focus Stationery and Computer Centre shall maintain different data retention requirements and retention periods for data owned and/or managed by the company as per current legislation

Organisation on personal devices Control

Focus Stationery and Computer Centre will not allow non company related equipment to be attached to the network

***Document Destruction Control***

Focus Stationery and Computer Centre shall maintain policies as per current legislation for destruction of physical documents.

Data Recovery (DR)

Focus Stationery and Computer Centre has full backups of all data on servers to portable devices that are stored in a locked safe. In the event of a server crash information can be restored on a new server



Business Continuity Policy

Focus has a full plan available for business continuity in the event of total loss of current office space

Information Security Policy;

- Focus Stationery and Computer Centre is highly reliant on its information assets to maintain and create value for our clients. Therefore, Focus Stationery and Computer Centre shall take all reasonable measures to assure the ongoing confidentiality, integrity and availability of all information assets.
- Focus Stationery and Computer Centre expects that all legal requirements regarding the use of information systems and the internet are complied with.
- Information security is the responsibility of every employee, supplier, contractor and/or stakeholder within Focus Stationery and Computer Centre.
- Focus Stationery and Computer Centre undertakes to provide all the necessary training and awareness to employees, suppliers, contractors and/or stakeholders to empower them to act in the best interest of Focus Stationery and Computer Centre information assets at all times. Any action or omission that results in the degradation of any information asset or group of information assets will be dealt with in terms of the Focus Stationery and Computer Centre disciplinary procedures and/or any applicable legal measures.

Computer network user access control

- It is Focus Stationery and Computer Centre' policy to restrict access to systems and resources to legitimate users via means of a secure password.
- Focus Stationery and Computer Centre requirement for a password complexity of user accounts is as follows:
 - Are required to have a password length of at least 8 characters;
 - Are required to contain both alphabetic and numeric characters;
 - Are required to contain at least one capital letter;
 - Are required to contain at least one special character;
 - Cannot use a password which is the same as any of the previous 4 passwords used;
- Inactive user accounts will be disabled after no more than 90 days of inactivity, unless authorised by management where the retention of such accounts is required for operational purposes;
- Password credentials:
 - Should not be dictionary-based;
 - Should not be shared with other user accounts on other systems;
 - Should not contain any personally identifiable information (eg. names of family members or pets, dates of birth, etc.)
 - Should not be shared with anybody for any reason;
 - Should not be committed to hardcopy;
- Inactive user accounts will be disabled after no more than 90 days of inactivity, unless authorised by management where the retention of such accounts is required for operational purposes;
- Password credentials:
 - Should not be dictionary-based;
 - Should not be shared with other user accounts on other systems;
 - Should not contain any personally identifiable information (eg. names of family members or pets, dates of birth, etc.)
 - Should not be shared with anybody for any reason;



- Should not be committed to hardcopy;

Appendix 3: Objection to the Processing of Personal Information in terms of Section 11(3) of the Protection of Personal Information Act, 2013

Regulations Relating to The Protection of Personal Information, 2018

Note:

- 1 Affidavits or other documentary evidence as applicable in support of the objection may be attached.
- 2 If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
- 3 Complete as is applicable

A	DETAILS OF DATA SUBJECT
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number	
Residential, postal or business address:	
Contact number(s):	
Fax number / E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname/ registered name of data subject:	
Residential, postal or business address:	
Contact number(s):	
Fax number / E-mail address:	
C	REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f) (Please provide detailed reasons for the objection)

Signed at this day of20...

.....
Signature of data subject/designated person



Appendix 4: Request for Correction or Deletion of Personal Information or Destroying or Deletion of Record of Personal Information in terms of Section 24(1) of the Protection of Personal Information Act, 2013

Regulations Relating to the Protection of Personal Information, 2018

[Regulation 3]

Note:

1. Affidavits or other documentary evidence as applicable in support of the request may be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. Complete as is applicable.

Mark the appropriate box with an "x".

Request for:

Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.

Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information

A	Details of Data Subject
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number	
Residential, postal or business address:	
Contact number(s):	
Fax number / E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname/ registered name of data subject:	
Residential, postal or business address:	
Contact number(s):	



Fax number / E-mail address:	
C	Reasons for Objection in Terms of Section 11(1)(D) to (F) (Please Provide Detailed Reasons for The Objection)
D	Reasons for *Correction or Deletion of the Personal Information about the Data Subject in Terms of Section 24(1)(a) which is in Possession or Under the Control of the Responsible Party; and or Reasons for *Destruction or Deletion of a Record of Personal Information about the Data Subject in Terms of Section 24(1)(b) which the Responsible Party is no longer Authorised to Retain. (Please Provide Detailed Reasons for the Request)

Antivirus and Malware Policy

1. Overview

The number of computer security incidents related to malware and viruses and the resulting cost of business disruption and service restoration continue to escalate. Implementing anti malware and antivirus systems, blocking unnecessary access to networks and computers, improving user security awareness, and early detection and mitigation of security incidents are best practice actions that must be taken to reduce risks and manage the Focus Stationery and Office Supplies cc computing environment.

2. Purpose

The purpose of this policy is to describe requirements for preventing and addressing computer virus, worm, spyware, malware, and other types of malicious software.

3. Scope

This policy applies to all Focus Stationery and Office Supplies cc staff using Focus Stationery and Office Supplies cc information resources.

4. Policy

The Information Officer or their designee shall ensure:

- Procedures and tools exist to guard against, detect, and report malicious software
- IT personnel are trained and proficient in the use of the security solutions used to protect against malicious software
- End users are aware of the security policies enforced on their workstations

A. COMPUTING ASSETS

All workstation and server based assets used for business, whether connected to the Focus Stationery and Office Supplies cc network or as standalone units, must use Focus Stationery and Office Supplies cc approved antivirus/antimalware protection software and configuration provided by the Focus Stationery and Office Supplies cc. The following procedures shall be followed:

- Virus protection software must not be disabled or bypassed
- Settings for the virus protection software must not be altered in a manner that will reduce the software effectiveness
- Automatic update frequency cannot be altered to reduce the frequency of updates
- All servers attached to the Focus Stationery and Office Supplies cc network must utilize Focus Stationery and Office Supplies cc approved/standard virus protection software and setup to detect and clean viruses
- All electronic mail gateways, devices, and servers must use Focus Stationery and Office Supplies cc approved e-mail virus/malware/spam protection software and must

adhere to Focus Stationery and Office Supplies cc rules for the setup and use of this software

- Any threat that is not automatically cleaned, quarantined, and subsequently deleted by malware protection software constitutes a security incident and must be reported to The Information Officer
- Antivirus/antimalware signature updates shall occur on a frequency defined by the Focus Stationery and Office Supplies cc but shall occur minimally once each calendar day

B. APPLICATION INSTALLATION AND MANAGEMENT

All Focus Stationery and Office Supplies cc authorized applications and software shall be installed. Focus Stationery and Office Supplies cc managed antivirus and malware software shall ensure:

- Authorized applications and software operate according to a clearly defined security policy
- All unauthorized applications and software are prevented from being executed.

C. LICENSING, MAINTENANCE AND SUPPORT

Maintenance actions (software updates, definition updates, infections, etc.) shall be logged and retained for a period aligning with Focus Stationery and Office Supplies cc requirements to allow proper investigations into malware related incidents.

Management shall ensure proper licensing, tracking, and related documentation. This shall include processes and procedures supporting:

- Antivirus software installation on all systems
- Regular threat scanning capable of detecting, removing, and protecting against known types of malicious software
- Annual review and re-evaluation of low-risk systems and appliances not considered affected by malicious software based on current best practice
- Pro-active monitoring and update mechanisms supporting this policy
- Verification that mechanisms are in place for preventing users from disabling or modifying antivirus detection tools
- Processes and procedures for exceptions to the policy exist and are followed based on a case-by-case evaluation
- If antivirus mechanisms are disabled, additional security measures may need to be implemented for the period of time during which antivirus protection is not active.

5. Audit Controls and Management

On-demand documented procedures and evidence of practices should be in place for this operational policy. Appropriate controls include:

- Virus and malware installation and update logs
- Associated virus scan and history logs
- Procedures for quarantine and removal of threats
- Documented remediation and communication procedures for large scale incidents

6. Enforcement

Staff members found in policy violation may be subject to disciplinary action, up to and including termination.

7. Distribution

This policy is to be distributed to all Focus Stationery and Office Supplies cc staff and contractors using Focus Stationery and Office Supplies cc information resources.

8. Policy Version History

Version	Date	Description	Approved By
1.0	18/06/2021	Antivirus and Malware Policy	Yogis Naicker

Website Privacy Policy

1. Overview

Focus Stationery and Office Supplies cc (“us”, “we”, or “our”) operates the Focus Stationery and Office Supplies cc website (the “Service”).

This page informs you of our policies regarding the collection, use and disclosure of Personal Information when you use our Service.

We will not use or share your information with anyone except as described in this Privacy Policy.

We use your Personal Information for providing and improving the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, accessible at <http://focussa.co.za>

2. INFORMATION COLLECTION AND USE

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personally identifiable information (“Personal Information”) may include, but is not limited to:

- Name
- Email address
- Telephone number
- Address

3. LOG DATA

We collect information that your browser sends whenever you visit our Service (“Log Data”). This Log Data may include information such as your computer’s Internet Protocol (“IP”) address, browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages and other statistics.

4. COOKIES

Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer’s hard drive.

We use “cookies” to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

5. SERVICE PROVIDERS

We may employ third party companies and individuals to facilitate our Service, to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used.

These third parties have access to your Personal Information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

6. SECURITY

The security of your Personal Information is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security.

7. LINKS TO OTHER SITES

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over, and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

8. CHILDREN'S PRIVACY

Our Service does not address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from children under 18. If you are a parent or guardian and you are aware that your child has provided us with Personal Information, please contact us. If we discover that a child under 18 has provided us with Personal Information, we will delete such information from our servers immediately.

9. COMPLIANCE WITH LAWS

We will disclose your Personal Information where required to do so by law or subpoena.

10. CHANGES TO THIS PRIVACY POLICY

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

11. CONTACT US

If you have questions or comments about this Cookie Policy, please contact us at:

011 474 4657
seelan@focussa.co.za

12. Distribution

This policy is to be distributed to all Focus Stationery and Office Supplies cc staff and contractors using Focus Stationery and Office Supplies cc information resources.

13. Policy Version History

Version	Date	Description	Approved By
1.0	18/06/2021	Website Privacy Policy	Yogis Naicker

Cookie Policy

1. Overview

Focus Stationery and Office Supplies cc (“we” or “us” or “our”) may use cookies, web beacons, tracking pixels and other tracking technologies when you visit our website including any other media form, media channel, mobile website, or mobile application related or connected thereto (collectively, the “Site”) to help customize the Site and improve your experience.

We reserve the right to make changes to this Cookie Policy at any time and for any reason. We will alert you about any changes by updating the Last Updated date of this Cookie Policy. Any changes or modifications will be effective immediately upon posting the updated Cookie Policy on the Site and you waive the right to receive specific notice of each such change or modification.

You are encouraged to periodically review this Cookie Policy to stay informed of updates. You will be deemed to have been made aware of, will be subject to and will be deemed to have accepted the changes in any revised Cookie Policy by your continued use of the Site after the date such revised Cookie Policy is posted.

2. Use of cookies

A “cookie” is a string of information which assigns you a unique identifier that we store on your computer. Your browser then provides that unique identifier to use each time you submit a query to the Site. We use cookies on the Site to, among other things, keep track of services you have used, record registration information, record your user preferences, keep you logged into the Site, facilitate purchase procedures, and track the pages you visit. Cookies help us understand how the Site is being used and improve your user experience.

3. Type of cookies

The following types of cookies may be used when you visit the Site:

4. Advertising Cookies

Advertising cookies are placed on your computer by advertisers and ad servers in order to display advertisements that are most likely to be of interest to you. These cookies allow advertisers and ad servers to gather information about your visits to the Site and other websites, alternate the ads sent to a specific computer, and track how often an ad has been viewed and by whom. These cookies are linked to a computer and do not gather any personal information about you.

5. Analytics Cookies

Analytics cookies monitor how users reached the Site, and how they interact with and move around once on the Site. These cookies let us know what features on the Site are working the best and what features on the Site can be improved.

6. Our Cookies

Our cookies are “first-party cookies”, and can be either permanent or temporary. These are necessary cookies, without which the Site won’t work properly or be able to provide certain features and functionalities. Some of these may be manually disabled in your browser, but may affect the functionality of the Site.

7. Personalization Cookies

Personalization cookies are used to recognize repeat visitors to the Site. We use these cookies to record your browsing history, the pages you have visited, and your settings and preferences each time you visit the Site.

8. Security Cookies

Security cookies help identify and prevent security risks. We use these cookies to authenticate users and protect user data from unauthorized parties.

9. Site Management Cookies

Site management cookies are used to maintain your identity or session on the Site so that you are not logged off unexpectedly, and any information you enter is retained from page to page. These cookies cannot be turned off individually, but you can disable all cookies in your browser.

10. Third-Party Cookies

Third-party cookies may be placed on your computer when you visit the Site by companies that run certain services we offer. These cookies allow the third parties to gather and track certain information about you. These cookies can be manually disabled in your browser.

11. Control of cookies

Most browsers are set to accept cookies by default. However, you can remove or reject cookies in your browser’s settings. Please be aware that such action could affect the availability and functionality of the Site.

For more information on how to control cookies, check your browser or device’s settings for how you can control or reject cookies, or visit the following links:

[Apple Safari](#)

[Google Chrome](#)

[Microsoft Edge](#)

[Microsoft Internet Explorer](#)

[Mozilla Firefox](#)

[Opera](#)

[Android \(Chrome\)](#)

[Blackberry](#)

[Iphone or Ipad \(Chrome\)](#)

[Iphone or Ipad \(Safari\)](#)

In addition, you may opt-out of some third-party cookies through the [Network Advertising Initiative's Opt-Out Tool](#).

12. Other tracking technologies

In addition to cookies, we may use web beacons, pixel tags, and other tracking technologies on the Site to help customize the Site and improve your experience. A "web beacon" or "pixel tag" is tiny object or image embedded in a web page or email. They are used to track the number of users who have visited particular pages and viewed emails, and acquire other statistical data. They collect only a limited set of data, such as a cookie number, time and date of page or email view, and a description of the page or email on which they reside. Web beacons and pixel tags cannot be declined. However, you can limit their use by controlling the cookies that interact with them.

13. Privacy policy

For more information about how we use information collected by cookies and other tracking technologies, please refer to our Privacy Policy posted on the Site. This Cookie Policy is part of and is incorporated into our Privacy Policy. By using the Site, you agree to be bound by this Cookie Policy and our Privacy Policy.

14. Contact us

If you have questions or comments about this Cookie Policy, please contact us at:

011 474 4657
seelan@focussa.co.za

15. Distribution

This policy is to be distributed to all Focus Stationery and Office Supplies cc staff and contractors using Focus Stationery and Office Supplies cc information resources.

16. Policy Version History

Version	Date	Description	Approved By
1.0	18/06/2021	Cookie Policy	Yogis Naicker

Bring Your Own Device (BYOD) and Acceptable Use Policy

1. Purpose

The BYOD and Acceptable Use Policy are part of Focus Stationery and Office Supplies cc Security Program. Information security policies are the principles that direct managerial decision-making and facilitate secure business operations. A concise set of security policies enables Focus Stationery and Office Supplies cc to manage the security of information assets and maintain accountability. These policies provide the security framework upon which all subsequent security efforts will be based. They define the appropriate and authorized behavior for personnel approved to use information assets, such as laptops, tablets and smartphones.

2. Applicability

The BYOD and Acceptable Use Policy applies to all employees, interns, contractors, vendors and anyone using assets. Policies are the organizational mechanism used to manage the confidentiality, integrity and availability issues associated with information assets. Information assets are defined as any information system (hardware or software), data, networks, and components owned or leased by or its designated representatives.

3. BYOD POLICY

This policy provides guidelines for using personally owned devices and related software for corporate use.

4. Applicability

The BYOD policy applies to all employees, contractors, vendors and any other person using or accessing information or information systems. Exceptions to this policy must be approved by the Information Officer or a designated representative.

Furthermore, based on the amount of personally identifiable information (PII) employees work with, management reserves the right to determine which employees can use personally owned devices and which cannot.

5. General Policy

recognizes that personally owned equipment can play a valuable role in convenience, efficiency and productivity of its employees. Nonetheless, the use of these devices must be monitored closely.

The following is a list of personally owned devices permitted by for corporate use:

- Desktop computers
- Laptop computers
- Tablets
- Personal digital assistants (PDAs)
- Smart phones
- Portable music players

6. Reimbursement

Focus Stationery and Office Supplies cc will NOT reimburse for the purchase of personally owned devices. Focus Stationery and Office Supplies cc is not responsible for any additional costs associated with learning, administering or installing these devices.

7. Registering Devices

All personally-owned devices must be registered with the Focus Stationery and Office Supplies cc.

8. End-User Support

As a general rule, users of personally owned devices will not use or request Focus Stationery and Office Supplies cc IT resources in the use, network connectivity or installation of their equipment or software. Users are responsible for learning, administering, installing and setting up their personally owned devices.

- Focus Stationery and Office Supplies cc will support personally owned devices as follows
- The user will be required to allow Focus Stationery and Office Supplies cc to load security software on each device.
- The user will be required to allow Focus Stationery and Office Supplies cc to install remote wiping software on each device.
- Upon request, the Focus Stationery and Office Supplies cc will install the necessary synchronization software to the user's desktop or notebook computer.

9. Device Security

The user should follow good security practices including:

- Password protect all personally owned devices
- Do not leave personally owned devices unattended

10. Release of Liability and Disclaimer to Users

hereby acknowledges that the use of personally owned devices in connection with business carries specific risks for which you, as the end user, assume full liability.

In the case of litigation, may take and confiscate a user's personally owned device at any time.

11. ACCEPTABLE USE POLICY

This policy provides rules for the acceptable use of personally owned devices on the corporate network.

12. Applicability

The Acceptable Use Policy applies to all employees, contractors, vendors and any other person using or accessing information or information systems. Exceptions to this policy must be approved by the Information Officer or a designated representative.

13. General Policy

Users that wish to access the network using their personally owned computer may do so using only - authorized software and only with the approval of the Information Officer.

Users must follow the same rules when accessing the network from both corporate-issued equipment and personally owned devices. When connected to the network, the user will NOT:

- Use the service as part of violating the law
- Attempt to break the security of any computer network or user
- Attempt to send junk email or spam to anyone
- Attempt to send a massive amount of email to a specific person or system in order to flood their server

14. Authorization of Devices

Focus Stationery and Office Supplies cc the right to determine the level of network access for each personally owned device. The user could be granted full, partial or guest access.

15. Third-Party Applications on Devices

Focus Stationery and Office Supplies cc reserves the right to block or limit the use of certain third-party applications, such as those that probe the network or share files illegally, that may harm the company network.

As the number of approved applications continually evolves, the user must check with the Information Officer for the current list of approved third-party applications and get the Information Officer's approval before downloading it on the device.

16. Remote Wiping

While Focus Stationery and Office Supplies cc does not own the device, they do own all company data. Therefore, reserves the right to remotely wipe the user's personally owned device at any time. Not only will company data get wiped, but the user's personal data could be lost as well. The user must understand and accept this risk.

Furthermore, the user must agree to a full wipe of the personally owned device if they leave. This may result in the loss of both company and personal data on the device.

17. Reporting Security Concerns

The user agrees to report the following immediately:

- If the device is lost or stolen
- If the device has been attacked with malware, a virus or any other suspicious attack.
- Any other security concern with regards to company data

18. Release of Liability and Disclaimer to Users

hereby acknowledges that the use of a personally owned device on the network carries specific risks for which you, as the end user, assume full liability.

19. Bring Your Own Device (BYOD) and Acceptable Use Policy

Security of information, and the tools that create, store and distribute that information are vital to the long-term health of Focus Stationery and Office Supplies cc. It is for this reason we have established our BYOD and Acceptable Use Policy.

All employees are expected to understand and actively participate in this program encourages its employees to take a proactive approach in identifying potential problems or violations by promptly reporting them to their supervisor.

Prior to using personal devices for company purposes, each employee is expected to have read the entire BYOD and Acceptable Use Policy.

If you have any uncertainty regarding the content of these policies, you are required to consult your supervisor. This should be done prior to signing and agreeing to the BYOD and Acceptable Use Policy.

I have read and understand 's BYOD and Acceptable Use Policy, and I understand the requirements and expectations of me as an employee.

20. Enforcement

Staff members found in policy violation may be subject to disciplinary action, up to and including termination.

21. Distribution

This policy is to be distributed to all Focus Stationery and Office Supplies cc staff and contractors using Focus Stationery and Office Supplies cc information resources.

22. Policy Version History

Version	Date	Description	Approved By
1.0	18/06/2021	BOYD Policy	Yogis Naicker

Data Protection Policy

1. Overview

The Focus Stationery and Office Supplies cc is committed to processing data in accordance with its responsibilities under the Popi and Popia Act that requires that personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to individuals;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the Popi Act in order to safeguard the rights and freedoms of individuals; and
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures."

2. General provisions

- This policy applies to all personal data processed by the Focus Stationery and Office Supplies cc.
- The Responsible Person shall take responsibility for the Focus Stationery and Office Supplies cc's ongoing compliance with this policy.
- This policy shall be reviewed at least annually.
- The Focus Stationery and Office Supplies cc shall register with the Information Registrar's Office as an organisation that processes personal data.

3. Lawful, fair and transparent processing

- To ensure its processing of data is lawful, fair and transparent, the Focus Stationery and Office Supplies cc shall maintain a Register of Systems.
- The Register of Systems shall be reviewed at least annually.
- Individuals have the right to access their personal data and any such requests made to the Focus Stationery and Office Supplies cc shall be dealt with in a timely manner.

4. Lawful purposes

- All data processed by the Focus Stationery and Office Supplies cc must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests.
- The Focus Stationery and Office Supplies cc shall note the appropriate lawful basis in the Register of Systems.
- Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Focus Stationery and Office Supplies cc's systems.

5. Data minimisation

- The Focus Stationery and Office Supplies cc shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

6. Accuracy

- The Focus Stationery and Office Supplies cc shall take reasonable steps to ensure personal data is accurate.
- Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

7. Archiving / removal

- To ensure that personal data is kept for no longer than necessary, the Focus Stationery and Office Supplies cc shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- The archiving policy shall consider what data should/must be retained, for how long, and why.

8. Security

- The Focus Stationery and Office Supplies cc shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- When personal data is deleted this should be done safely such that the data is irrecoverable.
- Appropriate back-up and disaster recovery solutions shall be in place.

9. Breach

- In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Focus Stationery and Office Supplies cc shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the Information Registrar.

10. Distribution

This policy is to be distributed to all Focus Stationery and Office Supplies cc staff and contractors using Focus Stationery and Office Supplies cc information resources.

11. Policy Version History

Version	Date	Description	Approved By
1.0	18/06/2021	Data Protection Policy	Yogis Naicker

Subject Access Request Policy

1. Overview

Under the Protection of Personal Information Act (POPI Act or POPIA) you, as a data subject, can ask us to confirm if we hold personal data about you; for copies of records of personal data that we hold, share or process about you; the period of time for which your personal data will be stored; the identity of any recipients of your personal data; the logic of automatic data processing, and the consequences of any profiling; and any other information relating to your personal data. This is known under the Popia as a data subject access request.

In order to deal with your request we can ask for proof of identity and enough information to enable us to locate the personal data that you request. Please complete this form and return it to us, or alternatively contact us in writing (post or email) to exercise your right to request the information described in this form, along with proof of your identity to:

Focus Stationery and Office Supplies cc
P O Box 53587
Troyeville
2139

seelan@focussa.co.za

We will acknowledge safe receipt and we will respond to your request within one month of your request, where possible.

2. Part 1: Person that the request relates to (the data subject)

Title: Mr / Mrs / Miss / Ms / Other	
Surname:	
Forenames:	
Any other names that you are known by that may assist in the search:	
Address:	
Postcode:	
Telephone:	
E-mail:	

3. Part 2: Proof of identity

Please include a copy of your identity card or passport..

This is to ensure that we are only sending information to the data subject and not to a third party that has not been authorized by you. If none of these are available, please contact Focus seelan@focussa.co.za for advice on other acceptable forms of identification.

4. Part 3: Information requested

To help us to deal with your request quickly and efficiently please provide as much detail as possible about the information you want.

I would like you to confirm if Focus Stationery and Office Supplies cc processes my personal data

<input type="checkbox"/>	Provide a copy of my personal information
Provide supporting and explanatory material on the following as detailed below:	
<input type="checkbox"/>	the purposes of processing
<input type="checkbox"/>	the categories of my personal data processed
<input type="checkbox"/>	the recipients, or categories of recipients of my personal data
<input type="checkbox"/>	the envisaged retention period of my personal data, or, if this is not possible, the criteria used to determine this period
<input type="checkbox"/>	my rights to rectification or deletion, to restrict processing or to object to processing, and to file a complaint to a data protection authority
<input type="checkbox"/>	information regarding the source of the personal data (if you did not collect this from me)
<input type="checkbox"/>	any automated decision making having legal or similar effects on me, as well as the logic involved and the consequences of the processing for me
<input type="checkbox"/>	where my personal data are transferred abroad, the appropriate safeguards relating to the transfer
<input type="checkbox"/>	I would like you to respond to my request and provide the information I have requested as follows:
<input type="checkbox"/>	Email
<input type="checkbox"/>	Post / Courier
<input type="checkbox"/>	Collection

If possible, please restrict your request to a particular policy, service, department, team, individual or incident. Please include time frames, dates, names or types of documents, any file reference, and any other information that may enable us to locate your data. For example, for e-mails, please provide the names of senders and recipients, and approximate dates.

[illegible]

I, _____, confirm that the information provided on this form is correct and that I am the data subject whose name appears on this form. I understand that Focus Stationery and Office Supplies cc must confirm proof of identity and that it may be necessary to contact me again for further information to locate the personal data I want. I understand that my request will not be valid until all of the information requested is received by Focus Stationery and Office Supplies cc. I also understand that whilst this request is free of charge, if I request the same information again or make unfounded or excessive requests, Focus Stationery and Office Supplies cc may charge a reasonable administrative fee to process my request as per our Popi & Popia Manual.

Signature: _____

Date: _____

5. Distribution

This policy is to be distributed to all Focus Stationery and Office Supplies cc staff and contractors using Focus Stationery and Office Supplies cc information resources.

6. Policy Version History

Version	Date	Description	Approved By
1.0	18/06/2021	Subject access request Policy	Yogis Naicker

Password Policy

1. Overview

The Password Policy defines the underlying requirements for management of strong user passwords to authenticate to system components within Focus Stationery and Office Supplies cc.

The scope of the Password Policy covers the whole of the business. This policy sets out when and why you need a password, how passwords can be created, used and changed.

2. Policy

1. It is Focus Stationery and Office Supplies cc policy to restrict access to systems and resources to legitimate users via means of a secure password.
2. The Focus Stationery and Office Supplies cc requirement for a password complexity of user accounts is as follows:
 - a. Are required to have a password length of at least 8 characters;
 - b. Are required to contain both alphabetic and numeric characters;
 - c. Are required to contain at least one capital letter;
 - d. Are required to contain at least one special character;
 - e. Cannot use a password which is the same as any of the previous 4 passwords used;
3. Inactive user accounts will be disabled after no more than 90 days of inactivity, unless authorised by management where the retention of such accounts is required for operational purposes;
4. Password credentials:
 - a. Should not be dictionary-based;
 - b. Should not be shared with other user accounts on other systems;
 - c. Should not contain any personally identifiable information (eg. names of family members or pets, dates of birth, etc.)
 - d. Should not be shared with anybody for any reason;
 - e. Should not be committed to hardcopy;
5. High-value/administrative accounts, such as accounts that allow the user to amend access rights and other important functionality, will require the use of multi-factor authentication (MFA) / two-step verification (2FA).

3. Distribution

This policy is to be distributed to all Focus Stationery and Office Supplies cc staff and contractors using Focus Stationery and Office Supplies cc information resources.

4. Policy Version History

Version	Date	Description	Approved By
1.0	18/06/2021	Password Policy	Yogis Naicker

Personal Information Sharing Policy

1. Overview

It is sometimes necessary to share personal data or information with other Focus Stationery and Office Supplies cc staff or with other organisations with which we have a relationship to ensure effective coordination and integration of services for our clients.

This guidance details the requirements for sharing personal data in a safe and appropriate way in adherence with the Data Protection Act 1998.

As a data controller we notify the Information Commissioner's Office on an annual basis about the way in which we process personal information and we also provide examples of the types of sharing that is commonly undertaken.

Sharing information refers to the disclosure of information internally between different parts of the Focus Stationery and Office Supplies cc or externally to a third party organisation.

2. Collecting personal data

The consent of the data subject should be obtained for collecting their personal data. Consent should be "informed" and "unambiguous". This means that the data subject needs to be told what information is to be shared, who it will be shared with, and why. They should be given the opportunity to object to the sharing of the data, or told that they can withdraw their consent at a later date. If consent is refused at any stage, a record should be kept of refusals, with dates. Explicit consent needs to be sought for the collection and processing of sensitive data.

It is acceptable to share information on a 'need to know' basis within the Focus Stationery and Office Supplies cc where client information is required for someone to do their job. However, sensitive personal data (e.g. disability or health information) should not normally be shared without the explicit consent of the client – this means individuals must be fully aware of who the information will be shared with and should have given their agreement to this.

3. Reason or purpose for sharing data

Sharing personal data is not an automatic assumption and you must have a clear purpose for doing so e.g. achieving an objective that can only be achieved by sharing the information.

Personal data can only be shared if there is a clear legal basis to do so or if the data subject has given their clear consent.

If you are required to share personal data you should be clear about the reasons for sharing the data, and what you intend to achieve by doing so. Ask yourself if the sharing of a particular piece of data is necessary for the working relationship.

When you collect any personal data you should always document the purpose you have for collecting the data, how it will be used, and with whom it will be shared. This should be reviewed and updated on a regular basis. Where databases of information are shared, responsibilities of staff should be made clear. Senior managers need to ensure compliance on their particular areas.

Any third party organisations with which you share information should separately, as data controllers, notify their purposes for processing data to the Information Commissioner. It may be that the different parties process or use shared information for the same purposes. Or it may be that the parties have different purposes for processing or using information. If the purposes differ, each party must ensure that they are separately abiding by the principles of the Data Protection Act, and that they are specifying their purposes to the Information Commissioner. Using information for different purposes can be acceptable, as long as it is compatible with, or "not contradictory" to the original purpose for collection of personal data.

There is a "research" exemption of the Data Protection Act that does allow for the further processing of personal data, as long as it is only for research purposes (including statistical or historical purposes), and as long as the data is not processed to support measures or decisions about individuals; and is not processed in such a way that substantial damage or distress is likely to be caused to the individual.

4. Data Protection principles

There are eight data protection principles that must be adhered to in all cases when sharing any information:

Principle One

Personal data shall be processed fairly and lawfully and, shall not be processed unless: -

- a) at least one of the conditions in Schedule 2 (of the Act) is met, and
- b) in the case of sensitive personal data, at least one of the conditions in Schedule 3 (of the Act) is also met.

Individuals should be made aware of which organisations are sharing their personal data and what their data is being used for.

Principle two

Personal data shall be obtained only for one or more specified and lawful purposes and shall not be further processed in any manner incompatible with that purpose or those purposes.

Principle three

Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.

Principle four

Personal data shall be accurate and, where necessary, kept up to date.

Principle five

Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

Principle six

Personal data shall be processed in accordance with the rights of data subjects under the Act.

Principle seven

Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

5. Disclosure of personal information

When disclosing personal data to a third party you should, where practicable, keep a record of the date and details of the transfer of information.

6. Respect for confidentiality of data subjects

The law of confidence is a common law concept, which means that there is no Act setting it out, but that it has been developed by the courts over individual cases. A duty of confidence arises when one person discloses information to another in circumstances where it is reasonable to expect that the information will be held in confidence. Examples may include safeguarding issues, health and wellbeing (including mental health), reporting of incidents and personal issues/circumstances. The duty of confidentiality applies whether the information has been requested or volunteered.

Data subjects sometimes allow us to gather sensitive information relating to their personal circumstances, health and wellbeing. They do so in confidence and they have the legitimate expectation that staff will respect their privacy and act appropriately.

Members of staff will often receive information of a personal and sensitive nature ranging from information required for administrative purposes related to application and enrolment to more sensitive information shared with tutors or wellbeing services. Compliance with confidentiality is the responsibility of all staff of Focus Stationery and Office Supplies cc. Breaching confidentiality inappropriately could lead to legal action and loss of reputation.

Respecting confidentiality is essential. Without the trust that confidentiality brings, data subjects might not seek help and advice, or they might not give all the facts needed to provide for their education, health and wellbeing.

Staff must ensure that personal information is not disclosed to unauthorised third parties which includes family members, friends, Government bodies and in certain circumstances, the police. All staff should exercise caution when asked to disclose personal information held on a data subject to a third party.

Personal information is usually disclosed with the consent of the data subject. When using, sharing or disclosing information you should:

- inform the person about possible uses of their information

- ask for consent before disclosing information that could identify them, if the information is needed for any other purpose
- disclose information that identifies the person only if this is necessary to achieve the purpose of the disclosure – in all other cases information should be anonymised before disclosing it
- keep disclosures to the minimum necessary and on a strictly 'need to know' basis

Sharing information with the right people can help to protect individuals from harm and ensure that they get the help they need. It can also reduce the number of times they are asked the same questions by different people.

If data subjects are able to take part in decision-making, you should explain why they need to share information, and ask for their consent. By asking for their consent to share relevant information, you are showing respect and involving them in decisions about their education, health and wellbeing.

7. Sharing information without consent

There are certain circumstances when a data subject might not agree to disclosure but you still need to disclose information e.g.

- when there is an overriding public interest in the disclosure
 - when it is judged that the disclosure is in the best interests of a student who does not have the maturity or understanding to make a decision a disclosure
- when disclosure is required by law
- when the data subject is at risk of sexual, physical or emotional abuse
 - when the information would help in the prevention, detection or prosecution of serious crime
 - when the data subject is involved in behaviour that might put them or others at risk of serious harm

8. Sharing information with the police

There is an exemption under the Data Protection Act which allows us to disclose information to the Police. This is known as the 'Section 29' exemption and covers disclosure for 'the prevention or detection of crime' and 'apprehension or prosecution of offenders'.

The police do occasionally ask for personal data as part of an inquiry but they don't have the automatic right to receive information about our staff or clients. You should not be pressured into handing over personal information. There is a special process to allow the police to access personal data for certain crime-related purposes. Please contact the Information Officer for further advice.

9. Consent

- Consent under POPI has to be specific, voluntary and informed.
- Since the burden of proof would be on you to show that it was given, some sort of record would be desirable.
- It's also important to remember that under 18s normally need a competent person to give consent.

Section 14(2) – (7) have further exceptions relating to retention for research / statistical purposes, where the personal information was used in a decision about the data subject, restriction of records etc.

It will probably be difficult to achieve a retention policy that covers the potentially thousands of record categories used by the organisation. One strategy is to start with the most widespread documents, like invoices and / or those containing the most sensitive personal information.

10. Distribution

This policy is to be distributed to all Focus Stationery and Office Supplies cc staff and contractors using Focus Stationery and Office Supplies cc information resources.

11. Policy Version History

Version	Date	Description	Approved By
1.0	18/06/2021	Personal Information Sharing Policy	Yogis Naicker

Security Compromise Policy

1. Overview

Focus Stationery and Office Supplies cc has implemented the following procedures to follow in the event of a data security breach involving personally information or other confidential information maintained on personal computers, Focus Stationery and Office Supplies cc networks, or internet programs used by staff and consultants.

The following staff have key responsibility for implementing and executing the data breach procedures:

- Seelan Naicker (011 474 4657, 082 800 1036)

2. Procedure

In the event of a data breach or imminent breach of data, in order to contain the data breach and minimize the extent of the intrusion:

- Disconnect the affected and related systems or networks from Internet access.
- Contact the information officer to notify them of the data breach or imminent breach of data.
- Document date and time the breach occurred, what files the user was accessing at the time of the breach, the breach team member contacted, and actions taken to secure data.
- Contact technical support to detect and remove the malware or other information related to the breach.
- Review virus/malware/other protective software to review system vulnerabilities and increase the level of protection for the system.
- If possible, reimage the system and restore from backup files.

3. Mitigation

Following the incident, Focus Stationery and Office Supplies cc staff will review procedures to determine if any actions by the user or the team contributed to the data breach. Staff will be updated on policies to protect against data breaches or imminent breaches of personal data.

A computer technician will review software, updates, and software/data protection programs to improve the security of the data and operating system to prevent further incidents. Information related to the data breach will be documented on the incident log, repairs or modifications implemented will be included on the log and kept in a secure location.

If necessary, the management team will review procedures and make necessary changes to the procedures to improve the security of personal and other secure information.

4. Distribution

This policy is to be distributed to all Focus Stationery and Office Supplies cc staff and contractors using Focus Stationery and Office Supplies cc information resources.

5. Policy Version History

Version	Date	Description	Approved By
1.0	18/06/2021	Security Compromise Policy	Yogis Naicker

Data Retention Policy

1. Overview

POPI requires that 'records of personal information must not be kept any longer than is necessary for achieving the purpose for which the information was collected...' Section 14(1) Practically this may be one of the most difficult provisions to comply with as it requires a very clear picture of all purposes for which a piece of information is kept and a thorough understanding of business processes. There are some exceptions to this rule, where the information may be kept for longer.

2. When required by law

- Records may be retained for longer when the retention "is required or authorised by law" Section 14(1)(a)
- Since numerous laws mandate the retention of different categories of record it can be a challenge just to find the relevant law.
- This guide detailing retention periods listed below

3. Required by contract

- As an example, your service contract with a customer might state that you are required to provide your customer with important safety updates regarding your product. In order to perform under the contract you would therefore need their contact information.

4. Consent

- Consent under POPI has to be specific, voluntary and informed.
- Since the burden of proof would be on you to show that it was given, some sort of record would be desirable.
- It's also important to remember that under 18s normally need a competent person to give consent.

Section 14(2) – (7) have further exceptions relating to retention for research / statistical purposes, where the personal information was used in a decision about the data subject, restriction of records etc.

It will probably be difficult to achieve a retention policy that covers the potentially thousands of record categories used by the organisation. One strategy is to start with the most widespread documents, like invoices and / or those containing the most sensitive personal information.

5. ACCOUNTABILITY

Document	Period of Retention	
	Retention in years	Reference
Accounting Records		
Ancillary books of account and supporting schedules	15	2&4
Annual financial statements	15	2&4
Annual financial statements working papers	4	4
Bank instructions	4	4
Bank statements and vouchers	4	4
Bills of exchange	6	10
Books of account	15	2&4
Cash books	15	2&4
Cheques	4	13
Consolidation schedules	15	2&4
Costing records	5	2
Creditors' invoices and statements	5	2
Creditors' ledgers	15	2&4



Debtors' ledgers	15	2&4
Debtors' statements	4	4
Deposit slips	4	4
Dividend and interest payment lists (listed company)	15	2
Fixed asset register	15	2&4
General ledgers	15	2&4
Goods received notes	4	4
Insolvent businesses	3	12
Payrolls	7	4&7
Petty cash books	15	2&4
Purchases invoices (with supporting documentation)	4	4
Purchase journals (with supporting documentation)	15	2&4
Purchase Orders	4	4
Railage and shipping documents	4	4
Receipts	4	4
Sales invoices (with supporting documentation)	4	4

Sales journals	15	2&4
Second hand goodsDetails of acquisition and disposal	3	19
Shipping documents – inwards and outwards(after completion of shipment date)	2	5
Stock records (supporting schedules)	15	2&4
Stock sheets	4	4
Year end working papers for companies	4	4
Document	Period of retention	
Contracts and Agreements	Retention in years	Reference
Agreements of historical significance	Permanently	n/a
Debts (The Prescription Act should be referred to as the period depends on the type of debts)	4-30	4&10
Indemnities and guarantees (after date of expiry)	5	1
Licensing agreements (after date of expiry)	5	1
Rental and hire purchase agreements, suspended sale agreements (after date of expiry)		1
▲		


Document	Period of retention	
Correspondence	Retention in years	Reference
General	3	1
Accounting related	5	1
Agreements (after termination)	5	1
▲		
Document	Period of retention	
Employee Records	Retention in years	Reference
Accident books and records	7	6&7
Application for jobs – unsuccessful	1	1
Apprentice records of remuneration	3	6
Arbitration award records	3	15
Collective agreement records	3	15
Determination records made in respect of Wage Act	3	6&15

Dispute records prescribed details of any: <ul style="list-style-type: none"> • Strike • Lockout • Protest action involving employees 	3	15
Expense accounts	4	4
Factory register	Permanently	8
Payrolls	7	4,6&7
Personal records of organisation's executives (for historical purposes)	Permanently	n/a
Salary revision schedules	7	6&7
Salary wage register	7	7&4
Staff records (after date employment ceases)	7	6&7
Tax returns – employees	4	4
Time and piecework records	7	6&7
Unemployment insurance contributor's card	Until service terminated	6
Wage and salary records (including overtime details)	7	4,6&7
Workmen's Compensation documents	3	
▲		


Document		Period of retention	
Insurance		Retention in years	Reference
Claim reports and accidents reports (after date of settlement)		3	1
Policies (after date of lapse)		4	4
▲			
Document		Period of retention	
Investment Records		Retention in years	Reference
Certificates and other documents of title		Permanently or until sold	n/a
Schedules and documents (after date investment sold)		15	2&4
Share investment certificates		Permanently or until sold	n/a
Transfer of marketable securities		5	2&4
▲			
Document		Period of retention	
Patents		Retention in years	Reference
Patent agreement with staff		Duration of patent or service of employee	1

Report and opinion on patents and trademarks (after date of expiry)	5	1
		
Document	Period of retention	
Pension Records	Retention in years	Reference
Actuarial valuation reports	10	1
Contribution records	4	4
Fund's annual account	Permanently	n/a
Group health, life and personal accident policies (after date of final cessation of any benefit payable under the policy)	5	1
Individual life policies under "Top Hat" schemes (after date of final cessation of benefit)	5	1
Investment records	15	2
Minutes of meetings of members and trustees	Permanently	n/a
Pension fund account records	15	2
Pension fund rules (including superseded rules)	Permanently	n/a
		
Document	Period of retention	

Property Records	Retention in years	Reference
Agreements with architects and builders (after date of completion)	5	1
Deeds of title	Permanently or until disposed	n/a
Leases (after date of expiry of lease and all queries have been settled)	5	2&4
Sectional title records	Permanently	n/a
Transfer duty records	Permanently	n/a
▲		
Document	Period of retention	
Share Registration Records	Retention in years	Reference
Acceptance forms	12	1
Accounting records of stock of brokers and carrier against shares	5	18
Allotment letters	12	1
Allotment sheets and return of allotment	15	2
Annual return and supporting documents	15	2
Application forms	12	1

Cancelled share of debenture certificates and balance receipts (many large transfer offices keep for one year only)	3	1
Cancelled share transfer forms	12	1&3
Change of address – notification	1	1
Dividends and interest <ul style="list-style-type: none"> mandates (from date of receipt) paid warrants payment lists unclaimed 	3 12 15 until cleared	1 1 1
Letters of indemnity for lost share certificates	Permanently	1
Power of attorney, stop notices and similar court orders (from date person ceased to be a member)	15	1
Redemption / conversion discharge forms of endorsed certificates	12	1
		
Document	Period of retention	
Statutory Records	Retention in years	Reference
Combund company register including:		
<ul style="list-style-type: none"> Branch register 	15	2

• Index of members	15	2
• Register of debenture holders	15	2
• Register of directors' attendance	15	2
• Register of directors and officers	15	2
• Register of directors' interest on contracts	15	2
• Register of members	15	2
• Register of pledges and mortgages	15	2
Documents of incorporation including:		
• Certificate of change of name	Permanently	2
• Certificate of incorporation	Permanently	2
• Certificate to commence business	Permanently	2
• Founding statement and amendments (Close Corporations)	Permanently	2&11
Memorandum and Articles of Association	Permanently	2
Minutes of meetings (originals for:		
• Board meetings	Permanently	2
• Committee meetings	Permanently	2

• General meetings	Permanently	2
• Minute books	Permanently	2&11
• Notification of change of address	1	1
Notices of general and class meetings proxy forms:		
• used	3	2
• used at court convened meetings	3	2
Special resolutions / resolutions passed at general / class meetings		
class meetings	Permanently	2
CM25	Permanently	2
CM26	Permanently	2
		
Document	Period of retention	
Tax Records	Retention in years	Reference
Income tax required records	4	4
Taxation returns and assessmentsRecords of subscriptions or levies paid by its members	15	12

▲		
Document	Period of retention	
VAT Documentation	Retention in years	Reference
Bank statements, deposit slips, stock lists paid by its member	Four years from last date of entry	13
Books of accounts	Four years from last date of entry	13
Detailed records of the registered vendor's transactions	4	13
Invoices, tax invoices, credit and debit notes	Four years from last date of entry	13
System documentation		
Charts and codes of accounts	4	13
Accounting system instruction manuals	4	13
System and program documentation	4	13
Other	4	13
In the case of all other records that are not required for the submission of the income tax return, for a period of 5 years from the date of the last entry in any book, or, if not in book form, from date of completion of the transactions, acts or operations to which they relate.		

6. Reference

1. Standard practice.
2. Companies Act No.61 of 1973 - Regulations for the Retention and reservation of Records (R2592 of 25 November 1983).
3. Stamp Duties Act No.77 of 1968, Section 23(6).
4. Income Tax Act No.58 of 1962, Sections 75(1) and (2).

In terms of the Income Tax Act No. 58 of 1962, Section 75 "The Commissioner may, subject to such conditions as he may determine, and in respect of such books (other than ledgers, cash books and journals) or documents as he may specify, authorize the retention of any book or document referred to in subsection (1) in a form acceptable to him lieu of the original thereof."

For years of assessment ending on or after 1 January 1993, all accounting records are to be retained for a period of five years from the date of receipt by Revenue, of the tax return, which incorporates information drawn from the last entry of that record.

The Income Tax Act No.113 of 1993 changed the retention period from five years to four years for years of assessment ending on or after 1 January 1994. The Taxation Laws Amendment Act No.97 of 1993 brings the retention period for VAT documents into line with the requirements of the Income Tax Act No.113 of 1993.

Consequently, the retention of accounting records for the 1993-year of assessment is five years from the date of receipt by Revenue of the tax return which incorporates information drawn from the last entry of the that record. For years of assessment ended on or after 1 January 1994 the period at retention has been reduced to four years on the same basis as for the 1993-year of assessment.

5. Customs and Excise Act No.91 of 1964, Section 101 and Regulation 1.04- Government Gazette No 4040 R17770 dated 5 October 1973.
6. Basic Conditions of Employment Act No.75 of the 1997, Section 29(4), 31(2). Manpower Training Act No.56 of 1981, Section 44(3). Unemployment Insurance Act No.30 of 1966, Section 32(1). Wages Act No.5 of 1957, Section 29(3).
7. Compensation for Occupational Injuries and Diseases Act, No.130 of 1993 Section 81(2). (Departmental practice recommends a limit of seven years on the requirement to preserve records).
8. Occupational Health and Safety Act No.85 of 1993 Section 8(1).
9. Co-Operatives Act No.91 of 1981 Section 237.
10. Prescription Act No.68 of 1969, Section 11c. The effect of prescription is, that the rights resulting from a contract are no longer enforceable by direct legal action:

- But the rights themselves are not destroyed, because the corresponding obligation or debt remains as a natural obligation;

- Therefore for safety reasons, documents should be kept longer than the periods laid down in the Prescription Act;

- Moreover, these periods can be extended because of interruption or suspension of the prescription.

11. Close Corporations Act No.69 of 1984, Regulations.

12. Insolvency Act No.24 of 1936, Section 155 and Section 134 (1).
13. Value Added Tax Act No.89 of 1991, Section 55 (1)
14. Guidance and Placement Act 62 of 1981, Section 15 (5).
15. Labour Relations Act No.66 of 1995, Section 53 (4), 54(1),98(4), 99; 205 (2)(a).
16. Transfer Duty Act No.40 of 1949 Section 15(1).
17. Mutual Banks Act No.124 of 1993, Section 42.
18. Stock Exchange Control Act No.1 of 1985, Section 43.
19. Second Hand Goods Act No. 23 of 1955 Section 6(8).
20. Sale and Service Matters Act No. 25 of 1964, Section 11.
21. Electronic Communication and Transactions Act, 25 of 2002.
22. Promotion of Access to Information Act, 2 of 2002
23. Promotion of Administration Justice Act, 3 of 2000
24. National Archives and Record Services Act, 43 of 1996 (as amended)
25. Public Finance Management Act, 1 of 1999
26. Financial Intelligence Centre Act, 38 of 2001
27. STANSA 15489, South African Standard for Record Management.
28. Green paper on e-Government.

7. VII. Distribution

This policy is to be distributed to all Focus Stationery and Office Supplies cc staff and contractors using Focus Stationery and Office Supplies cc information resources.

8. Policy Version History

Version	Date	Description	Approved By
1.0	18/06/2021	Data Retention Policy	Yogis Naicker

CCTV Policy

1. Overview

Focus Stationery and Office Supplies cc operates closed-circuit television ("CCTV") surveillance infrastructure on its premises.

The cameras are positioned so that they record areas. Footage of these areas is recorded and stored for a limited amount of time.

Focus Stationery and Office Supplies cc undertakes to ensure that its employees adhere to the strictest levels of confidentiality and respect individual's right of privacy.

2. ACCOUNTABILITY

Focus Stationery and Office Supplies cc "processes" "Personal Information" (which contained in the CCTV surveillance footage) as contemplated in the Protection of Personal Information Act, No. 4 of 2013 (the "Act"), at all times taking into account individual's constitutional right to privacy.

The authorisation for the collection, location and access of the CCTV surveillance footage ("Data") lies with Focus Stationery and Office Supplies cc. The Data may then be accessed, through Focus Stationery and Office Supplies cc's systems, with the Information Officer's express prior written consent..

Focus Stationery and Office Supplies cc shall fully comply with its obligations in terms of the Act, depending on the capacity in which it is acting any given circumstance.

Focus Stationery and Office Supplies cc will be processing Personal Information where, given the purpose for which it is processed, such processing is adequate, relevant and not excessive.

Details and records of all information processed by Focus Stationery and Office Supplies cc will be maintained to the extent required by law.

3. Purpose

The purpose of this policy is to outline Focus Stationery and Office Supplies cc's approach to the use of CCTV surveillance for purposes in line with the Act. Specifically, the Focus Stationery and Office Supplies cc strives to:

- process any Data lawfully, and in reasonable manner which does not unreasonably infringe on the privacy of the data subject;
- only process Data where, to do so, protects a legitimate interest of members of the public;
- ensure each individual's constitutional right to privacy, by safeguarding Personal Information when processed by it or any of its customers (each of which constitutes a Responsible Party in terms of the Act), subject to justifiable limitations;
- balance the privacy rights of individuals against other rights, particularly the rights of employees and customers to safety and security;
- regulate the manner in which Data may be processed, by establishing conditions in accordance with locally applicable laws and international standards, that prescribe the minimum threshold requirements for the lawful processing of Personal Information;
- advise individuals of their rights and remedies in order to protect their Personal Information from processing that is not in accordance with the Act; and
- comply with voluntary and compulsory measures, including those established by the Information Regulator, to ensure respect for and to promote, enforce and fulfil the rights protected by the Act.

The purpose of Focus Stationery and Office Supplies cc CCTV surveillance network is to:

- detect, deter and prevent crime;
- enhance safety of those who work and visit the areas covered by the CCTV surveillance network;
- assist in the apprehension and prosecution of offenders of crime (including but not limited to the use of images and video as evidence in criminal/civil proceedings
- Data gathered by the CCTV surveillance network will not be used for any purposes other than those listed above and/or permitted by the Act.
- Data will not, under any circumstances, be released to the media or any similar outlet, nor will any Data be released or disseminated unless specifically required or authorised by law.

- All Data will be stored on hosted servers and identified using an automatic recording sequence. The Data will be stored for a period of at least 30 days, being the length of time the Data is required to be maintained in order to achieve the purpose for which it was collected.
- This retention period may be increased or decreased in line with any lawful instruction provided by the Information Regulator or other competent authority from time to time. Data may be stored for a longer period should it be required for further investigation.
- At the expiry of this retention period, the data will be permanently deleted and/or destroyed in accordance with POPIA stipulated guidelines.
- No cameras will be hidden or obscured, nor will they be placed in such a fashion that any camera will be able to record activity in any area which is not considered to be 'public'
- All captions inserted onto collected Data, such as camera location, time and date, are securely maintained and stored and are incapable of being tampered with.

4. PUBLIC AWARENESS OF CCTV SURVEILLANCE

- Prior to the deployment of CCTV cameras, Focus Stationery and Office Supplies cc, together with stakeholders make its intention know to commence CCTV surveillance in that area.
- In order to ensure that all members of the public entering any area in which the CCTV surveillance network operates are informed of the surveillance, prominent signs will be posted in these areas.

5. Policy

1. It is the responsibility of all employees and agents to:
 - a. Ensure the security and confidentiality of personal information.
 - b. Protect against anticipated threats to the security and/or integrity of such information.
 - c. Guard against unauthorised access to or use of such records or information that could result in substantial harm or inconvenience to any data subject.
2. The reasons for shredding documents are:
 - a. To ensure that personal information is safeguarded and not accessed by unauthorised individuals; and
 - b. To encourage the efficient recycling of all printed materials.
3. If using off site shredding services, all shredding containers should be locked whilst awaiting emptying or collection. Documents to be shredded should be placed in the appropriate container and should not be left to accumulate in offices. Only reputable shredding service providers shall be used.
4. For offices that shred their own documents, the shredded material is put into the plastic bags that are included with the shredders. The purchase of an appropriate office shredder for the purpose of shredding confidential information is recommended. When a shredding bag is filled it must be placed in the appropriate venue for recycling.

6. VII. Distribution

This policy is to be distributed to all Focus Stationery and Office Supplies cc staff and contractors using Focus Stationery and Office Supplies cc information resources.

7. Policy Version History

Version	Date	Description	Approved By
1.0	18/06/2021	CCTV Policy	Yogis Naicker

Document Shredding Policy

1. Overview

To define the policy related to the shredding of documents and related personal and confidential information. The scope of the Document Shredding Policy covers the whole of the business. This policy sets out how Focus Stationery and Office Supplies cc deals with paper documents that it is no longer required to store or is no longer allowed to store.

2. Policy

1. It is the responsibility of all employees and agents to:
 - a. Ensure the security and confidentiality of personal information.
 - b. Protect against anticipated threats to the security and/or integrity of such information.
 - c. Guard against unauthorised access to or use of such records or information that could result in substantial harm or inconvenience to any data subject.
2. The reasons for shredding documents are:
 - a. To ensure that personal information is safeguarded and not accessed by unauthorised individuals; and
 - b. To encourage the efficient recycling of all printed materials.
3. If using off site shredding services, all shredding containers should be locked whilst awaiting emptying or collection. Documents to be shredded should be placed in the appropriate container and should not be left to accumulate in offices. Only reputable shredding service providers shall be used.
4. For offices that shred their own documents, the shredded material is put into the plastic bags that are included with the shredders. The purchase of an appropriate office shredder for the purpose of shredding confidential information is recommended. When a shredding bag is filled it must be placed in the appropriate venue for recycling.

3. VII. Distribution

This policy is to be distributed to all Focus Stationery and Office Supplies cc staff and contractors using Focus Stationery and Office Supplies cc information resources.

4. Policy Version History

Version	Date	Description	Approved By
1.0	18/06/2021	Document Shredding Policy	Yogis Naicker



INFORMATION REGULATOR (SOUTH AFRICA)

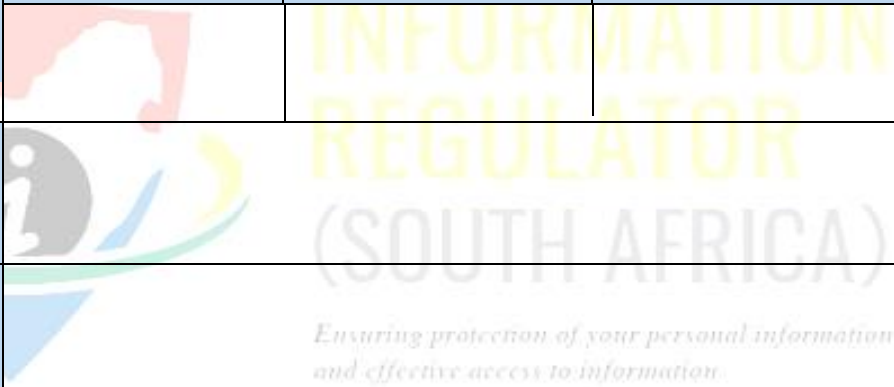
*Ensuring protection of your personal information
and effective access to information*

INFORMATION OFFICER'S REGISTRATION FORM

NOTE: *The personal information submitted herein shall be solely used for your registration with the Information Regulator ("Regulator").*

All the information submitted herein shall be used for the purpose stated above, as mandated by law. This information may be disclosed to the public. The Regulator undertakes to ensure that appropriate security control measures are implemented to protect all the information to be submitted in this document.

PART A INFORMATION OFFICER	
Full Name of Information Officer	Seelan Naicker
Designation	Operations Manager
Postal Address	
Physical Address	
Cellphone Number	0828001036
Landline Number	0114744657
Fax Number	086 654 1925
Direct Email Address	seelan@focussa.co.za
General Email Address	info@focussa.co.za

PART B			
DEPUTY INFORMATION OFFICER			
Personal details of designated or delegated Deputy Information Officer(s)	Name	Name	Name
	Direct Landline	Direct Landline	Direct Landline
	Cellphone Number	Cellphone Number	Cellphone Number
	Email Address	Email Address	Email Address
Postal Address			
Physical Address			
Fax Number			
General Email			

PART C			
BODY / RESPONSIBLE PARTY			
Type of Body	Public Body		Private Body <input checked="" type="checkbox"/>
Full Name of the Body (Registered Name)	Focus Stationery and Computer Centre cc		
Trading Name	Focus Stationery and Office Supplies		
Registration No, if any	1992/02999//23		

Postal Address	
Physical Address	
Landline Number	011 4744657
Fax Number	086 654 1925
Email Address	info@fociussa.co.za
Website	https://focussa.co.za

PART D DECLARATION

I declare that the information contained herein is true, correct and accurate.

SIGNED and **DATED** at Johannesburg on this the 21 day of June **202**¹

Seelan Naicker

Seelan Naicker (Jun 21, 2021 17:06 GMT+2)


INFORMATION OFFICER

PART E

THE FOLLOWING INFORMATION IS REQUIRED FOR STATISTICAL PURPOSES

Please choose a sector(s) that apply to your Body

GOVERNMENT			PUBLIC ENTITIES			PRIVATE BODY			PROFESSION		
Item	Classification of Government	X	Item	Classification of a Public Entity	X	Item	Name of Industry Sector	X	Item	Type of profession	X
1.	National Government		1.	Constitutional Entities		1	Education		1	Legal	
2.	Provincial Government		2.	Schedule 2 Public Entity		2	Financial		2	Built Environment	
3.	Local Government		3.	Schedule 3A Public Entity		3	Health Facilities		3	Financial	
LEGISLATURE			4.	Schedule 3B Public Entity		4	Telecommunications		4	Medical and Allied Health Services	
National Assembly			5.	Schedule 3C Public Entity		5	Pharmaceutical		OTHERS, Specify		
National Council of Provinces			OTHERS, specify			6	Media and Social Media		5.		
Gauteng Provincial Legislature			7	Retail/Direct Marketing							
Western Cape Provincial Legislature			8	Tourism							

GOVERNMENT		PUBLIC ENTITIES	PRIVATE BODY			PROFESSION
Northern Cape Provincial Legislature			9	Transportation, Storage and Logistics		
Limpopo Provincial Legislature			10	Manufacturing/Production		
Northwest Provincial Legislature			11	Banks		
Free State Provincial Legislature			12	International Organizations		
Mpumalanga Provincial Legislature			13	Real Estate		
Eastern Cape Provincial Legislature			OTHERS, specify			
KwaZulu-Natal Provincial Legislature			(SOUTH AFRICAN) <i>Ensuring protection of your personal information and effective access to information.</i>			

InfoRegSA-eForm-InformationOfficersRegistration-2021

Final Audit Report

2021-06-21

Created:	2021-06-21
By:	Seelan Naicker (seelan.naicker23@gmail.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAA6WNGEVJJiIMVJ1x2C-hvR-mM0-tk2UZD

"InfoRegSA-eForm-InformationOfficersRegistration-2021" History



Document created by Seelan Naicker (seelan.naicker23@gmail.com)

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2021-06-21 - 3:05:32 PM GMT



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2021-06-21 - 3:06:10 PM GMT- IP address: 197.185.105.66



Document e-signed by Seelan Naicker (seelan@focussa.co.za)

Signature Date: 2021-06-21 - 3:06:48 PM GMT - Time Source: server- IP address: 197.185.105.66



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Adobe Sign



REPUBLIC OF SOUTH AFRICA

FORM E

AUTOMATICALLY AVAILABLE RECORDS AND ACCESS TO SUCH RECORDS:
 (Section 52 of the Promotion of Access to Information Act, 2000 (Act 2 of 2000))
 [Regulation 9A]

DESCRIPTION OF CATEGORY OF RECORDS AUTOMATICALLY AVAILABLE IN TERMS OF SECTION 52(1)(a) OF THE PROMOTION OF ACCESS TO INFORMATION ACT, 2000	MANNER OF ACCESS TO RECORDS (e.g. website) (SECTION 52(1)(b))
FOR INSPECTION IN TERMS OF SECTION 52(1)(a)(i):	
.....
FOR PURCHASING IN TERMS OF SECTION 52(1)(a)(ii):	
.....
FOR COPYING IN TERMS OF SECTION 52(1)(a)(ii):	
.....
AVAILABLE FREE OF CHARGE IN TERMS OF SECTION 52(1)(a)(iii):	
.....



J750

REPUBLIC OF SOUTH AFRICA

FORM A
REQUEST FOR ACCESS TO RECORD OF PUBLIC BODY
(Section 18(1) of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000))
[Regulation 6]

FOR DEPARTMENTAL USE

Reference number:

Request received by (state rank,
name and surname of information officer/deputy information officer) on (date)
at(place).

Request fee (if any): R

Deposit (if any): R

Access fee: R

.....
SIGNATURE OF INFORMATION OFFICER/DEPUTY INFORMATION OFFICER

A. Particulars of public body

The Information Officer/Deputy Information Officer

B. Particulars of person requesting access to the record

- (a) The particulars of the person who requests access to the record must be given below.
 (b) The address and/or fax number in the Republic to which the information is to be sent, must be given.
 (c) Proof of the capacity in which the request is made, if applicable, must be attached.

Full names and surname:

Identity number:

--	--	--	--	--	--	--	--	--	--	--	--	--

Postal address:

Telephone number: (.....) Fax number: (.....)

E-mail address:

Capacity in which request is made, when made on behalf of another person:

C. Particulars of person on whose behalf request is made

This section must be completed ONLY if a request for information is made on behalf of another person.

Full names and surname:

Identity number:

--	--	--	--	--	--	--	--	--	--	--	--	--

D. Particulars of record

- (a) 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.
 (b) If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

1. Description of record or relevant part of the record:

.....

2. Reference number, if available:

3. Any further particulars of record:

.....

.....

.....

.....

.....

E. Fees

- (a) A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid.
- (b) You will be notified of the amount required to be paid as the request fee.
- (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 for exemption from payment of fees:

.....

.....

.....

.....

F. Form of access to record

If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 below, state your disability and indicate in which form the record is required.

Disability:	Form in which record is required:
Mark the appropriate box with an X .	
NOTES:	
(a) Compliance with your request for access in the specified form may depend on the form in which the record is available.	
(b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.	
(c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.	

1. If the record is in written or printed form:					
	copy of record*		inspection of record		
2. If record consists of visual images - (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.):					
	view the images		copy of the images*		transcription of the images*

FORM A: REQUEST FOR ACCESS TO RECORD OF PUBLIC BODY

3. If record consists of recorded words or information which can be reproduced in sound:					
	listen to the soundtrack (audio cassette)		transcription of soundtrack* (written or printed document)		
4. If record is held on computer or in an electronic or machine-readable form:					
	printed copy of record*		printed copy of information derived from the record*		copy in computer readable form* (stiffy or compact disc)

*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable.	YES	NO
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.		
In which language would you prefer the record?		

G. Notice of decision regarding request for access

You will be notified in writing whether your request has been approved / denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.
--

How would you prefer to be informed of the decision regarding your request for access to the record?

.....

Signed at this day of year

.....
SIGNATURE OF REQUESTER /
PERSON ON WHOSE BEHALF REQUEST IS MADE



REPUBLIC OF SOUTH AFRICA

FORM B
NOTICE OF INTERNAL APPEAL
(Section 75 of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000))
[Regulation 8]

STATE YOUR REFERENCE NUMBER:

A. Particulars of public body

The Information Officer/Deputy Information Officer:

B. Particulars of requester/third party who lodges the internal appeal

- (a) The particulars of the person who lodge the internal appeal must be given below.
 (b) Proof of the capacity in which appeal is lodged, if applicable, must be attached.
 (c) If the appellant is a third person and not the person who originally requested the information, the particulars of the requester must be given at C below.

Full names and surname:

Identity number:

--	--	--	--	--	--	--	--	--	--	--	--	--

Postal address:

Telephone number: (.....) Fax number: (.....)

E-mail address:

Capacity in which an internal appeal on behalf of another person is lodged:

C. Particulars of requester

This section must be completed ONLY if a third party (other than the requester) lodges the internal appeal.

Full names and surname:
Identity number:

--	--	--	--	--	--	--	--	--	--	--	--	--

D. The decision against which the internal appeal is lodged

Mark the decision against which the internal appeal is lodged with an X in the appropriate box:

	Refusal of request for access
	Decision regarding fees prescribed in terms of section 22 of the Act
	Decision regarding the extension of the period within which the request must be dealt with in terms of section 26(1) of the Act
	Decision in terms of section 29(3) of the Act to refuse access in the form requested by the requester
	Decision to grant request for access

E. Grounds for appeal

If the provided space is inadequate, please continue on a separate folio and attach it to this form. You must sign all the additional folios.

State the grounds on which the internal appeal is based:

.....

.....

.....

.....

.....

State any other information that may be relevant in considering the appeal:

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F. Notice of decision on appeal

You will be notified in writing of the decision on your internal appeal. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

State the manner:

Particulars of manner:

Signed at this day of year.....

.....
SIGNATURE OF APPELLANT

FOR DEPARTMENTAL USE:

OFFICIAL RECORD OF INTERNAL APPEAL:

Appeal received on (date) by
..... (state rank, name and surname of information officer/deputy information officer).

Appeal accompanied by the reasons for the information officer's/deputy information officer's decision and, where applicable, the particulars of any third party to whom or which the record relates, submitted by the information officer/deputy information officer on (date) to the relevant authority.

OUTCOME OF APPEAL:

DECISION OF INFORMATION OFFICER/DEPUTY INFORMATION OFFICER CONFIRMED/NEW DECISION
SUBSTITUTED

NEW DECISION:

DATE RELEVANT AUTHORITY

RECEIVED BY THE INFORMATION OFFICER/DEPUTY INFORMATION OFFICER FROM THE RELEVANT
AUTHORITY ON (date):



FORM C
REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY
(Section 53(1) of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000))
[Regulation 10]

The Head:

B. Particulars of person requesting access to the record

- (a) The particulars of the person who requests access to the record must be given below.
- (b) The address and/or fax number in the Republic to which the information is to be sent must be given.
- (c) Proof of the capacity in which the request is made, if applicable, must be attached.

Full names and surname:

[illegible]

Postal address:

Telephone number: (.....) Fax number: (.....)

E-mail address:

Capacity in which request is made, when made on behalf of another person:

C. Particulars of person on whose behalf request is made

This section must be completed ONLY if a request for information is made on behalf of another person.

Full names and surname:

[illegible]

D. Particulars of record

- (a) 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.
- (b) If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

1. Description of record or relevant part of the record:

.....

.....

.....

.....

2. Reference number, if available:

.....

.....

.....

.....

3. Any further particulars of record:

.....

.....

.....

.....

E. Fees

- (a) A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid.
- (b) You will be notified of the amount required to be paid as the request fee.
- (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 for exemption from payment of fees:

.....

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.....

F. Form of access to record

If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 below, state your disability and indicate in which form the record is required.

Disability:	Form in which record is required:
Mark the appropriate box with an X .	
NOTES:	
(a) Compliance with your request for access in the specified form may depend on the form in which the record is available.	
(b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.	
(c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.	

1. If the record is in written or printed form:					
	copy of record*		inspection of record		
2. If record consists of visual images - (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.):					
	view the images		copy of the images*		transcription of the images*
3. If record consists of recorded words or information which can be reproduced in sound:					
	listen to the soundtrack (audio cassette)		transcription of soundtrack* (written or printed document)		
4. If record is held on computer or in an electronic or machine-readable form:					
	printed copy of record*		printed copy of information derived from the record*		copy in computer readable form* (stiffy or compact disc)

*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable.	YES	NO
--	-----	----

G. Particulars of right to be exercised or protected

If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

1. Indicate which right is to be exercised or protected:

.....

.....

.....

2. Explain why the record requested is required for the exercise or protection of the aforementioned right:

.....

.....

.....

H. Notice of decision regarding request for access

You will be notified in writing whether your request has been approved / denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the record?

.....

Signed at this day..... ofyear

.....
SIGNATURE OF REQUESTER /
PERSON ON WHOSE BEHALF REQUEST IS MADE



REPUBLIC OF SOUTH AFRICA

FORM D

AUTOMATICALLY AVAILABLE RECORDS AND ACCESS TO SUCH RECORDS:
 (Section 15 of the Promotion of Access to Information Act, 2000 (Act 2 of 2000))
 [Regulation 5A]

DESCRIPTION OF CATEGORY OF RECORDS AUTOMATICALLY AVAILABLE IN TERMS OF SECTION 15(1)(a) OF THE PROMOTION OF ACCESS TO INFORMATION ACT, 2000	MANNER OF ACCESS TO RECORDS (e.g. website) (SECTION 15(1)(b))
FOR INSPECTION IN TERMS OF SECTION 15(1)(a)(i):	
.....
FOR PURCHASING IN TERMS OF SECTION 15(1)(a)(ii):	
.....
FOR COPYING IN TERMS OF SECTION 15(1)(a)(ii):	
.....
AVAILABLE FREE OF CHARGE IN TERMS OF SECTION 15(1)(a)(iii):	
.....

Data Breach Incident From

INFORMATION OFFICER/INVESTIGATOR DETAILS:			
NAME:		POSITION:	
DATE:		TIME:	
DDI:		EMAIL:	
INCIDENT INFORMATION:			
DATE/TIME OR PERIOD OF BREACH:			
DESCRIPTION & NATURE OF BREACH:			
TYPE OF BREACH:			
CATEGORIES OF DATA SUBJECTS AFFECTED:			
CATEGORIES OF PERSONAL DATA RECORDS CONCERNED:			
NO. OF DATA SUBJECTS AFFECTED:		NO. OF RECORDS INVOLVED:	
IMMEDIATE ACTION TAKEN TO CONTAIN/MITIGATE BREACH:			
STAFF INVOLVED IN BREACH:			
PROCEDURES INVOLVED IN BREACH:			
THIRD PARTIES INVOLVED IN BREACH:			

BREACH NOTIFICATIONS:		
WAS THE INFORMATION REGULATOR NOTIFIED?	YES	NO
IF YES, WAS THIS WITHIN 72 HOURS?	YES	NO
<i>If no to the above, provide reason(s) for delay</i>		
IF APPLICABLE, WAS THE BELOW INFORMATION PROVIDED?	YES	NO
A description of the nature of the personal data breach		
The categories and approximate number of data subjects affected		
The categories and approximate number of personal data records concerned		
The name and contact details of the Information Officer and/or any other relevant point of contact (for obtaining further information)		
A description of the likely consequences of the personal data breach		
WAS NOTIFICATION PROVIDED TO DATA SUBJECT?	YES	No
INVESTIGATION INFORMATION & OUTCOME ACTIONS:		
DETAILS OF INCIDENT INVESTIGATION:		
PROCEDURE/S REVISED DUE TO BREACH:		
STAFF TRAINING PROVIDED: <i>(if applicable)</i>		

DETAILS OF ACTIONS TAKEN AND INVESTIGATION OUTCOMES:

**HAVE THE MITIGATING ACTIONS PRVENTED THE BREACH FROM OCCURRING AGAIN?
(Describe)**

**WERE APPROPRIATE TECHNICAL PROTECTION MEASURES IN PLACE? YES/NO If yes to the
above, describe measures**

Investigator Signature: _____

Investigator Name: _____

Date: _____

Authorised by: _____

Date: _____