

LDT GROUP (PTY) LTD

Registration number: 2014 / 280624 / 07

PAIA MANUAL

Published in terms of Section 51 of The Promotion of Access to Information Act, Number 2 of 2000

1. Introduction

1.1. Purpose of the Manual

This Promotion of Access to Information Manual ("Manual") outlines the types of records and personal information held by LDT Group (Pty) Ltd and explains how to submit requests for access to these records in accordance with the Promotion of Access to Information Act 2 of 2000 ("PAIA Act"). The Manual also explains how to access, object to, or request the correction of personal information held by LDT Group (Pty) Ltd under the Protection of Personal Information Act 4 of 2013 ("POPI Act").

1.2. Compliance with PAIA and POPIA

This Manual is compiled in accordance with Section 51 of PAIA as amended by POPIA. POPIA aims to promote the protection of personal information processed by public and private bodies, and sets conditions for the lawful processing of personal information.

1.3. Objective

The objective of this Manual is to facilitate access to records of the company as provided for under the Promotion of Access to Information Act and to comply with the requirements set by the Protection of Personal Information Act.

2. Definitions

1. Data Subject

An individual who is the subject of personal data. A data subject does not include a deceased individual or someone who cannot be identified or distinguished from others.

2. LDT Group (Pty) Ltd

Refers to LDT Group (Pty) Ltd, duly registered under the laws of South Africa, Registration number 2014 / 280624 / 07.

3. Requester

Refers to any person or entity requesting access to information from LDT Group (Pty) Ltd.

4. The Act

Refers to the Promotion of Access to Information Act 2 of 2000.

3. About LDT Group (Pty) Ltd

3.1. Overview of the Company

LDT Group (Pty) Ltd operates as an asset security products manufacturer, offering a wide range of asset products and solutions to a diverse client base. The company's website is owned and operated by LDT Group (Pty) Ltd.

3.2. Contact Details

LDT Group (Pty) Ltd

Unit 83, Trevallyn Park West, Granite Drive, Kya Sands, 2169

Telephone: 010 502 0692

Email: admin@ldt.co.za

4. Information Regulators Guide

An official Guide has been compiled by the Information Regulator, which provides information to assist persons wishing to exercise their rights of access to information under PAIA and POPIA.

Information Regulator Contact Details

Address: 33 Hoofd Street Forum III, 3rd Floor Braampark, Braamfontein, Johannesburg

Telephone: +27 (0)10 023 5200

Email: infoereg@justice.gov.za

Website: <https://www.justice.gov.za/infoereg/>

5. Entry Point for Requests

5.1. Eligibility to Request Information

A request for information can only be made if the information is necessary for the exercise or protection of a legitimate right.

5.2. Required Particulars

To process a request, the requester must provide sufficient details to help LDT Group (Pty) Ltd identify the right they seek to protect and explain how the requested information will help in exercising or protecting that right.

5.3. Exclusions

PAIA cannot be used to access records related to criminal or civil proceedings unless they are requested before the commencement of such proceedings.

5.4. Information Officer

The Information Officer is responsible for receiving and coordinating all access requests to ensure compliance with PAIA and POPIA.

5.5. Request Submission

All requests should be directed to the Information Officer using the contact details provided in Section 3.2.

5.6. Automatically Available Records

Records such as brochures, press releases, publications, and other marketing materials are automatically available for inspection, purchase, or photocopying via the LDT Group (Pty) Ltd website and do not require a formal request.

6. Information Available in Terms of POPIA

Personal information processed by LDT Group (Pty) Ltd will only be used for specified purposes. For more details, refer to LDT Group (Pty) Ltd's Privacy Policy available on our website.

7. Categories of Data Subjects and Personal Information Processed

LDT Group (Pty) Ltd processes personal information in relation to:

- Employees or staff of LDT Group (Pty) Ltd
- Contractors of LDT Group (Pty) Ltd
- Suppliers of LDT Group (Pty) Ltd
- Service providers of LDT Group (Pty) Ltd
- Customers of LDT Group (Pty) Ltd

8. Recipients of Personal Information

LDT Group (Pty) Ltd may disclose personal information to the following categories of recipients:

- Statutory oversight bodies, regulators, or judicial commissions of enquiry
- Courts, administrative forums, or other legal bodies making requests for data
- Third parties conducting business with LDT Group (Pty) Ltd

9. Trans-border Flow of Personal Information

Personal information may be transferred across South African borders when necessary for business transactions, provided that such transfers comply with South African legislative requirements or where the data subject consents to the transfer.

10. Personal Information Received from Third Parties

LDT Group (Pty) Ltd will only process personal information received from third parties if they have written consent from the data subject, confirming their awareness of this PAIA Manual and LDT Group (Pty) Ltd's Privacy Policy.

11. Applicable Legislation

LDT Group (Pty) Ltd complies with various legislation, including but not limited to:

- Basic Conditions of Employment Act 75 of 1997
- Companies Act 71 of 2008
- Compensation of Occupational Injuries and Diseases Act 130 of 1993
- Cybercrimes Act 19 of 2020
- Electronic Communications and Transaction Act 25 of 2002
- Labour Relations Act 66 of 1995
- Promotion of Access to Information Act 2 of 2000
- Protection of Personal Information Act 4 of 2013
- Value Added Tax Act 89 of 1991

12. Records Available Upon Request

LDT Group (Pty) Ltd maintains records on the following categories, but access to these records will be assessed on a case-by-case basis:

- Financial records
- Employee records
- Client records
- Service provider and supplier records
- Intellectual property and other proprietary documents

13. Procedure for Requesting Information

13.1. Completion of Form

A request for access must be made using Form C as prescribed in Appendix B of the PAIA Act.

13.2. Required Documentation

The request should be specific and include proof of identity. In the case of a request made on behalf of another person, proof of capacity must also be submitted.

13.3. Fees

A request fee of R50 is applicable. Additional access fees may apply, depending on reproduction, search, preparation, and postal costs.

14. Grounds for Refusal of Request

Access to records may be refused on grounds such as:

- Protection of third-party personal information
- Protection of commercial information
- Legal privilege or confidentiality
- Risk to public safety or environmental harm

15. Remedies for Refusal

If a request is refused, the requester may apply to a court or the Information Regulator for a review.

16. Availability of the Manual

This Manual is available for inspection, free of charge, at LDT Group (Pty) Ltd's offices, or upon request.

Annexures

- Annexure A: Form C – Request for Access to Record of Private Body (Section 53(1) of the Promotion of Access to Information Act, 2000)

This format should be in line with the legal requirements set out in PAIA and POPIA, providing clarity to data subjects and requesters regarding their rights and the company's obligations under South African law.