

Access To Information Manual

As required by Section 51 of the Promotion to Access of Information Act No 2 of 2000 (PAIA) Last Updated: 12 December 2015

This manual helps you get access to our information

This manual will help you get access to information we hold. We are required in terms of PAIA to make this manual available to you so you can see what type of information we have, as well as how you can request to get access to it.

Our details

Company name	3 Way Marketing (Pty) Ltd
Registration Number	2015/020891/07
Postal Address	312 Kent Avenue, Randburg, 2194
Physical Address	312 Kent Avenue, Randburg, 2194
Telephone Number	011 447 7511
Fax Number	011 447 7536
General contact email address for the company	privacy@3waymarketing.co.za
Email address for heads of the company	devin@3waymarketing.co.za
Website	http://www.3waymarketing.co.za

Further guidance on how you can get access to information

If you would like to find out more information about PAIA you can contact the South African Human Rights Commission ("SAHRC") who have compiled a guide, in each official language on how to exercise any right contemplated in PAIA. If you want to get the guide, the SAHRC can be contacted on either 011 484 8300 or via their website, www.sahrc.org.za.

The records we hold

A description of the records held by the company, as required by section 51(1)(e) of PAIA, is set out in the table below.

CATEGORIES OF RECORDS ON EACH SUBJECT	FORM HELD	AVAILABILITY
1. Company Secretarial Records		
Company Incorporation Documents	Electronic and physical	Automatically available
Names of Directors	Electronic and physical	Automatically available on company website [www.3waymarketing.co.za]
Salaries of Directors	Electronic and physical	Not automatically available
2. Financial Records of the Company		
Financial statements	Electronic and physical	Not automatically available
Documents relating to taxation of the company	Physical	Not automatically available
Financial Agreements	Physical	Not automatically available
Banking Details	Electronic and physical	Automatically available. Send email to [tomg@3waymarketing.co.za]
3. Insurance of Company		
Insurance Policies held by the Company	Physical	Not automatically available

CATEGORIES OF RECORDS ON EACH SUBJECT	FORM HELD	AVAILABILITY
Register of all immovable property owned by the company	Physical	Not automatically available
4. Employees		
List of Employees	Electronic and physical	Not automatically available
Personal information of employees	Electronic and physical	Not automatically available
Employee contracts of employment	Electronic and physical	Not automatically available
Pension Funds & Provident Fund	Electronic and physical	Not automatically available
Salaries of Employees	Electronic and physical	Not automatically available
Leave records	Physical	Not automatically available
5. Company Policies and Directives		
Internal relating to employees and the company	Electronic and physical	Not automatically available
External relating to clients and other third parties	Electronic and physical	Not automatically available
6. Agreements or Contracts		
Standard Agreements	Physical	Not automatically available
Contracts concluded with customers	Physical	Not automatically available
NDA's	Physical	Not automatically available
Letter's of Intent, MOU's	Physical	Not automatically available
Third party contracts (such as JV agreements, VAR Agreements etc.)	Physical	Not automatically available
Office management contracts	Physical	Not automatically available
Supplier contracts	Physical	Not automatically available
7. Regulatory		
Permits, Licences or Authorities	Physical	Not automatically available
8. Published Information		
External Newsletters and Circulars	Electronic and physical	Automatically available
Internal Newsletters and Circulars	Electronic and physical	Not automatically available
Information on the company published by third parties	Electronic and/or physical	Not automatically available
9. Customer Information		
Customer Details	Electronic and physical	Not automatically available
Contact details of individuals within customers	Electronic and physical	Not automatically available
Communications with customers	Electronic and physical	Not automatically available

How you can request Access

In order to comply with our obligations in terms of PAIA we have authorized and designated Devin Karpes to deal with all matters relating to PAIA. In order to request access to a record please complete the Request for Access Form which is available at www.sahrc.org.za and submit it to the company at its physical address, its fax number or general contact email address provided above.

Information we hold to comply with the law

We hold information in accordance with the following legislation:

1. Basic Conditions of Employment No. 75 of 1997
2. Companies Act No. 761 of 2008
3. Credit Agreements Act No. 75 of 1980
4. Employment Equity Act No. 55 of 1998
5. Income Tax Act No. 95 of 1967
6. Labour Relations Act No. 66 of 1995
7. Protection of Personal Information Act No. 4 of 2013
8. Tax on Retirement Funds Act No. 38 of 1996
9. Unemployment Contributions Act No. 4 of 2002
10. Unemployment Insurance Act No. 63 of 2001
11. Value Added Tax Act No. 89 of 1991

Other Information as may be Prescribed

The Minister of Justice and Constitutional Development has not made any regulations in terms of section 51(f) of the Act.

We may refuse you access to protect others

In terms of PAIA we are allowed to refuse you access to certain documents. These grounds for refusal are to protect –

- › the privacy of another person;
- › commercial information of another company;
- › confidential information of another person;
- › the safety of individuals and property;
- › records privileged from production in legal proceedings;
- › research information.

You will be notified in writing whether your request has been approved or denied within 30 calendar days after we have received a completed Request for Access Form. Should any record of the company requested by you not be found or not exist, the company will, by way of affidavit, notify you that it is not possible to give access to that particular record.

In what form we will give you access

If your request for access to records of the company is approved, we will determine how we will provide access to you, unless you have requested access in a specific form.

How much it will cost you

Section 52 (3) states that fees payable for access to records are to be prescribed. The prescribed fees are as set out in the **Fee Schedule** which is available at www.sahrc.org.za.

Processing Personal Information

In terms of POPI we are required to detail how and what personal information we process. We process personal information to save you time and money by helping you find the most suitable products or services for your needs. To better understand our data subjects so we can match you with the most suitable provider who best caters for your needs.

We process the personal information of economically active people in SA who are older than 18.

We process many different kinds of personal information, mainly names, numbers, age, address, and insurance history.

We provide your information to providers of products or services who can offer the best deals on what you want, saving you money and time.

We do not plan to transfer personal information across borders out of SA, but we may do so to secure or backup the data, or for technical reasons. The nature of cloud computing means that some data may be transferred across borders. Where it is within our control we will only transfer data to other countries who have similar privacy and data protection laws as our own.

How we protect personal information

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect.

The services we use make use of relatively secure data transmission and storage technologies to reasonably protect your personal information from unauthorised disclosure and maintain your personal information's integrity. For more details you can read our comprehensive Information Security Policy.