

MANUAL PREPARED IN ACCORDANCE WITH SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT NO. 2 OF 2000 PRIVATE BODY MANUAL V1.2 (26 JANUARY 2024)

1. CONTACT DETAILS OF THE PRIVATE BODY – Section 51(1)(a)

Name of Body: CONCILIUM TECHNOLOGIES (PTY) LTD (“CONCILIUM”)
Registration No: 1999/01330/07
Physical Address: 10 Central Park, 13 Esdoring Nook, Highveld, Centurion, 0157, Gauteng, South Africa
Telephone: +27 (0)12 678 9200
Head of Body: Andrew Clive Cole
Information Officer: Andrew Clive Cole
Telephone: +27 (0)12 678 9200
Email: info@concilium.co.za
Website: www.concilium.co.za

Nature of the Company:

Concilium conducts business as a services and solutions provider across various sectors that include Broadcast, Telecommunications and Electronics.

2. SECTION 10 GUIDE

- 2.1. In terms of section 10 of the Promotion of Access to Information Act No. 2 of 2000 (“Act”), the South African Human Rights Commission has published a guide containing information relating to:
- 2.1.1. obtaining access to a record of a Private Body and the assistance that is available from the South African Human Rights Commission in this regard,
 - 2.1.2. lodging a court application against a decision by the head of a private body,
 - 2.1.3. the fees that are payable for accessing a record, and
 - 2.1.4. the voluntary disclosure of information by private bodies.
- 2.2. The contact details of the South African Human Rights Commission are as follows:
- 2.2.1. South African Human Rights Commission: PAIA Unit
 - 2.2.2. Physical Address:
 - Braampark Forum 3
 - 33 Hoofd Street
 - Braamfontein, Johannesburg
 - Gauteng, 2017
 - Telephone: 011 877 3600
 - Facsimile: 011 404 0668
 - Website: www.sahrc.org.za
 - E-mail: paia@sahrc.org.za

3. SECTION 52(2) NOTICE

No notice has been published in terms of section 52 of the Act. However, we set out the categories of records of CONCILIUM that are already publicly available without you having to request access in terms of the Act and where they may be located.

Memorandum of Incorporation	CIPC
Contents of Register of Directors	CIPC

4. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

Insofar as may be applicable, CONCILIUM retains records of information to the extent required in terms of, inter alia, the following legislation:

- 4.1. Basic Conditions of Employment Act 75 of 1997;
- 4.2. Broad Based Black Economic Empowerment Act No.53 of 2003;
- 4.3. Companies Act 71 of 2008;
- 4.4. Compensation for Occupational Injuries and Diseases Act 130 of 1993;
- 4.5. Competition Act, Act No 89 of 1998;
- 4.6. Consumer Protection Act 68 of 2008;
- 4.7. Credit Agreements Act No. 75 of 1980;
- 4.8. Constitution of South Africa Act 108 of 1996;
- 4.9. Copyright Act 98 of 1978;
- 4.10. Currency and Exchanges Act No. 9 of 1933;
- 4.11. Customs and Excise Act, 1964;
- 4.12. Criminal Procedure Act 51 of 1977;
- 4.13. Electronic Communications and Transactions Act 25 of 2002;
- 4.14. Electronic Communications Act No. 36 of 2005;
- 4.15. Employment Equity Act 55 of 1998;
- 4.16. Financial Intelligence Centre Act, 38 of 2001;
- 4.17. Income Tax Act 58 of 1962;
- 4.18. Insolvency Act 24 of 1936;
- 4.19. Insurance Act 27 of 1943;
- 4.20. Labour Relations Act 66 of 1995;
- 4.21. Medical Schemes Act 131 of 1998;
- 4.22. Occupational Health and Safety Act 85 of 1993;
- 4.23. Patents Act 57 of 1987;
- 4.24. Pension Funds Act 24 of 1956;
- 4.25. Prevention of Organised Crime Act 14 of 1998;
- 4.26. Protection of Personal Information Act 4 of 2013;
- 4.27. Regulation of Interception of Communications and Provisions of Communications-related Information Act 70. of 2002;
- 4.28. SA Reserve Bank Act No. 90 of 1989;
- 4.29. Skills Development Act 97 of 1998;
- 4.30. Skills Development Levies Act 9 of 1999;
- 4.31. South African Revenue Service Act 34 of 1997;
- 4.32. Tax on Retirement Funds Act No 38 of 1996;
- 4.33. Telecommunications Act No. 103 of 1996 (repealed but regulations still in force);
- 4.34. Unemployment Insurance Contributions Act No. 4 of 2002;
- 4.35. Unemployment Insurance Act 63 of 2001;
- 4.36. Value-Added-Tax Act 89 of 1991.

Although CONCILIUM has used its best endeavours to supply you with a list of applicable legislation it is possible that the above list may be incomplete. Whenever it comes to CONCILIUM's attention that existing or new legislation allows a requestor access on a basis other than that set out in the Act, we shall update the list accordingly.

5. SCHEDULE OF RECORDS HELD BY THE COMPANY

- 5.1. No notice has been submitted to the Minister of Justice and Constitution Development regarding the categories of records which are available without a person having to request access in terms of s52(2) of PAIA. The information on the website of the business, however, is automatically available without having to request access in terms of PAIA.
- 5.2. General information about CONCILIUM can be accessed on the company website: www.conciliium.co.za , which is available to all persons with access to the internet.
- 5.3. CONCILIUM Information Categorisation and Classification:

Classification Category	Right to Access (Permissions)	Explanation of Right to Access per Act
1	May be disclosed	Public access document
2	May not be disclosed	Request for, or after commencement of, criminal or civil proceedings [s7]
3	May not be disclosed	Subject to copyright and/or Non-Disclosure Agreements
4	Limited disclosure	Personal information that belongs to the requestor of that information [s61]
5	May not be disclosed	Unreasonable disclosure of personal information of natural person [s63(1)]
6	May not be disclosed	Likely to harm the commercial or financial interests of CONCILIUM or third party [s64(a)(b)]
7	May not be disclosed	Likely to harm a third party in contract or other negotiations [s64(c)]
8	May not be disclosed	Would breach a duty of confidence owed to a third party in terms of an agreement [s65]
9	May not be disclosed	Likely to compromise the safety of individuals or protection of property [s66]
10	May not be disclosed	Legally privileged document [s67]
11	May not be refused	Environmental testing / investigation which reveals public safety / environmental risks [s64(3)]
12	May not be disclosed	Commercial information of private body [s68]
13	May not be disclosed	Likely to prejudice research and development information of CONCILIUM or a third party [s69]
14	May not be refused	Disclosure in public interest [s70]

COMPANY RECORDS AVAILABILITY

CLASSIFICATION CATEGORY	COMPANY RECORD	DESCRIPTION / DETAILS
3	PRODUCTS AND SERVICES	CURRENT PRODUCT AND SERVICES DATA AND INFORMATIONS
1	COMPANY PUBLIC RECORDS	COMPANY PUBLIC RECORDS AVAILABLE ON COMPANY WEBSITE AND SOCIAL MEDIA PLATFORMS
1	COMPANY PUBLIC RECORDS	COMPANY MEDIA RELEASES AND MARKETING MATERIAL
4 / 5 / 8 / 9	EMPLOYEE MASTER DATA & CONTRACTS	DATA CONTAINING ANY AND ALL EMPLOYEE PERSONAL AND FINANCIAL INFORMATION
4 / 5 / 6 / 8 / 9	SHAREHOLDER AGREEMENTS AND DATA	ALL CURRENT AND HISTORICAL EMPLOYMENT CONTRACTS OF ALL CURRENT AND PAST EMPLOYEES
13	PERSONNEL GUIDELINES AND POLICIES	ALL CONCILIUM INTERNAL POLICY DOCUMENTS AND PROCEDURE GUIDELINES RELATING TO ITS PERSONNEL
4 / 5 / 8 / 9	EMPLOYEE MEDICAL RECORDS	ALL CURRENT AND FORMER EMPLOYEE MEDICAL RELATED RECORDS

CLASSIFICATION CATEGORY	COMPANY RECORD	DESCRIPTION / DETAILS
8 / 12	COMPANY FINANCIAL STATEMENTS	ALL RECENT AND PREVIOUS AUDITED AFS
8 / 12	COMPANY TAX RECORDS	ALL RECENT AND PREVIOUS TAX RELATED DOCUMENTS INCL ALL TAX RETURNS
12	ASSET REGISTER	ALL CURRENT AND HISTORICAL FIXED ASSET REGISTERS
12 / 13	MANAGEMENT ACCOUNTS	ALL CURRENT AND HISTORICAL MANAGEMENT ACCOUNTS
6 / 10 / 13	GENERAL COMPANY LEGAL CONTRACTS	ALL CURRENT AND HISTORICAL RECORDS
10 / 13	COMPANY POLICIES AND PROCEDURES	ALL CURRENT AND HISTORICAL RECORDS
3	TRADEMARK INFORMATION	ALL CURRENT AND HISTORICAL RECORDS
1	STATUTORY RECORDS	ALL CURRENT AND HISTORICAL RECORDS
13	MARKET INFORMATION	ALL CURRENT AND HISTORICAL RECORDS
1	PRODUCT BROCHURES	ALL CURRENT AND HISTORICAL RECORDS
13	PRODUCT SALES RECORDS AND HISTORY	ALL CURRENT AND HISTORICAL RECORDS
5 / 6 / 7	CUSTOMER INFORMATION and CONTRACTS	ALL CURRENT AND HISTORICAL CUSTOMER RECORDS
5 / 6 / 7	SUPPLIER / PRINCIPAL INFORMATION and CONTRACTS	ALL CURRENT AND HISTORICAL RECORDS

6. PURPOSE OF PROCESSING OF PERSONAL INFORMATION

CONCILIUM process personal information to:

- 6.1. provide our goods or supply our services;
- 6.2. better understand our data subjects' needs when doing so;
- 6.3. keep our data subject records up-to-date;
- 6.4. manage employees in general;
- 6.5. manage supplier contracts in general;
- 6.6. manage customers in general;
- 6.7. manage customer credit in general;
- 6.8. market to customers in various countries;
- 6.9. market goods and services to prospects;
- 6.10. process customer requests or complaints; and
- 6.11. process personal information of employees for COMMERCIAL purposes.

7. TYPES AND CATEGORIES OF PERSONAL INFORMATION RETAINED

CONCILIUM processes and retains many different categories of personal information, including:

- 7.1. contact details, such as phone numbers, physical and postal addresses, email;
- 7.2. personal details, such as names and ages;
- 7.3. demographic details, such as races and age groups;
- 7.4. employee health information;
- 7.5. employee biometric information;

- 7.6. employee psychometric information;
- 7.7. bank and financial industry account numbers;
- 7.8. background information;
- 7.9. employee criminal (police clearance) information;
- 7.10. contract information;
- 7.11. credit information;
- 7.12. market intelligence information; and
- 7.13. debt and debtor information

8. KNOWN RECIPIENTS OF PERSONAL INFORMATION

CONCILIUM may provide personal information to fulfil its obligations in the ordinary course of business, to the following recipients:

- 8.1. Its customers or clients,
- 8.2. Statutory authorities,
- 8.3. Law enforcement,
- 8.4. Tax authorities,
- 8.5. Financial institutions,
- 8.6. Medical schemes,
- 8.7. Employee Retirement funds,
- 8.8. Industry bodies,
- 8.9. Contractors, vendors, or suppliers,

9. PLANNED TRANS-BORDER PROVISION OF PERSONAL INFORMATION

- 9.1. CONCILIUM may provide personal information outside of South Africa to various countries.
- 9.2. CONCILIUM will only transfer data to other countries who have similar privacy laws to South Africa's or to recipients who can guarantee the protection of personal information to the same standard as that of CONCILIUM.
- 9.3. It is standard policy and practice for CONCILIUM and its contracting parties to sign non-disclosure agreements and abide by confidentiality clauses of such agreements, further enhancing the protection of personal information by all parties.

10. SECURITY

- 10.1. CONCILIUM endeavours to secure all its data by maintaining reasonable measures to protect personal information from loss, misuse, unauthorised access, disclosure, alteration and destruction.
- 10.2. CONCILIUM also takes reasonable steps to keep personal information accurate, current, complete, and reliable for its intended use.
- 10.3. CONCILIUM continuously establishes and maintains appropriate, reasonable technical and organisational measures to ensure that the integrity of the personal information in its possession or under its control is secure and that such information is protected against unauthorised or unlawful processing, accidental loss, destruction or damage, alteration or access by having regard to the requirements set forth in law, in industry rules and generally accepted information security practices and procedures which apply to CONCILIUM.
- 10.4. CONCILIUM seeks to carry out regular assessments to
 - 10.4.1. identify all reasonably foreseeable internal and external risks to personal information in its possession and control, and
 - 10.4.2. verify that safeguards are effectively implemented to secure personal information.
- 10.5. Where applicable, CONCILIUM updates its existing safeguards to maintain the security of the personal information in its possession and control.

11. THE REQUISITION PROCEDURE FOR ACCESS TO PERSONAL INFORMATION

- 11.1. Forms and fees:
 - 11.1.1. A request for information must be made on the [prescribed form](#).
 - 11.1.2. must be addressed to the Information Officer and must be submitted with the [prescribed fee](#) as set out on the SAHRC website.
 - 11.1.3. The prescribed fees are determined by the South African Human Rights Commission, whose contact details are set out in this document.
- 11.2. Form of request

- 11.2.1. The requestor must use the prescribed form to make the request for access to a record.
- 11.2.2. This request must be made to the address or electronic mail address of the information Officer and must contain the requestor's postal address within the Republic as well as electronic email address.
- 11.2.3. The requestor must provide sufficient detail on the request form to enable the Information Officer to identify the record requested and the requestor.
- 11.2.4. The requestor should also indicate which form of access is required. The requestor should indicate if notice of the decision of the Information Officer is required in any manner, other than in writing, and if so, the necessary particulars to be so informed.
- 11.2.5. In the request form, the requestor must identify the right that is sought to be exercised or to be protected and provide an explanation of why the requested record is required for the exercise or protection of that right.
- 11.2.6. If a request is made on behalf of another person, the requestor must submit proof of the capacity in which the requestor is making the request to the satisfaction of the Information Officer.

12. FEES

- 12.1. A requestor who seeks access to a record containing personal information about that requestor, is not required to pay the request fee. Every other requestor, who is not a personal requestor, must pay the required request fee.
- 12.2. The Information Officer must by notice, require the requestor to pay the prescribed fee, if any, set out in the notice, before further processing the request.
- 12.3. The requestor may lodge an application with a court against the payment of the prescribed request fee.
- 12.4. After the Information Officer has made a decision on the request, the requestor must be notified in the required form.
- 12.5. If the request is granted then a further access fee must be paid for the search, reproduction, preparation and for any time, in excess of the prescribed hours, required to search and prepare for the record disclosure.

13. OTHER INFORMATION REQUIRED BY LEGISLATION

- 13.1. The Minister of Justice and Constitutional Development has not made any regulations in this regard.

14. AVAILABILITY OF THE MANUAL

- 14.1. This manual is available for inspection by the general public upon request during office hours and free of charge at CONCILIUM's physical address as well as on CONCILIUM's website:
www.conciliium.co.za