

**CLICKON COMMUNICATIONS (PTY) LTD  
MANUAL PREPARED IN TERMS OF SECTION 51 OF  
THE PROMOTION OF ACCESS TO INFORMATION ACT (ACT 2 OF 2000)**

**Note: This manual is based on "EXAMPLE OF A MANUAL FOR A PRIVATE BODY" issued by the South African Human Rights Commission, amended to meet the needs of ClickOn Communications, with further additions to enhance its usefulness and comply with the Protection of Personal Information Act, No. 4 of 2013.**

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This Manual is intended to assist persons wishing to access information in terms of the Act from any member of ClickOn Communications.

## 1 INFORMATION REQUIRED UNDER SECTION 51(1) (a) OF THE ACT

<b>Postal Address of ClickOn:</b>	Danie le Roux
<b>Postal Address of ClickOn:</b>	PO Box 2284, Silverton, 0127
<b>Street Address of ClickOn:</b>	1 <sup>st</sup> Floor, Acacia House, Greenhill Village Office Park, Cnr Nentabos and Botterklapper Street, Die Wilgers, Pretoria, 0184
<b>Tel. No of ClickOn:</b>	012 803 6783
<b>Fax. No of ClickOn:</b>	N/A
<b>E- Mail address of ClickOn:</b>	<a href="mailto:support@clickon.co.za">support@clickon.co.za</a>
<b>Person delegated to deal with requests (for "the designated head"):</b>	Brian Minty
<b>E-mail address of the delegated designated head:</b>	<a href="mailto:brianm@clickon.co.za">brianm@clickon.co.za</a>

## 2 DESCRIPTION OF GUIDE REFERRED TO IN SECTION 10

A Guide has been compiled in terms of Section 10 of PAIA by the South African Human Rights Commission (SAHRC). It contains information required by a person wishing to exercise any right, contemplated by PAIA. It is available in all of the official languages.

The Guide is available for inspection, *inter alia*, at the office of the offices of the Human Rights Commission at The Guide is available for inspection, *inter alia*, at the office of the South African Human Rights Commission at Braampark Forum 3, 33 Hoofd Street, Braamfontein, Johannesburg, Gauteng and at [www.sahrc.org.za](http://www.sahrc.org.za).

For further information please contact the SAHRC:

Postal Address: Private Bag 2700, Houghton, 2041  
 Telephone Number: +27-11-877 3600  
 Fax Number: +27-11-403 0625  
 Email: [mnyuswa@sahrc.org.za](mailto:mnyuswa@sahrc.org.za)

### RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

Records available in terms of other legislation are as follows:

Administration of Estates Act, No. 66 of 1965  
 Arbitration Act No. 42 of 1965  
 Basic Conditions of Employment Act No. 75 of 1997  
 Broad-based Black Economic Empowerment Act 53 of 2003  
 Companies Act No 71 of 2008 and Applicable Regulations

Compensation for Occupational Injuries and Health Diseases Act No. 130 of 1993  
Competition Act No. 89 of 1998  
Consumer Affairs (Unfair Business Practice) Act No. 71 of 1988  
Consumer Protection Act 68 of 2008  
Copyright Act No. 98 of 1978  
Customs and Excise Act, 55 of 1998;  
Electronic Communications Act, No. 36 of 2005;  
Electronic Communications and Transactions Act No 25 of 2002  
Employment Equity Act. No. 55 of 1998  
Exchange Control Amnesty and Amendment of Taxation Laws Act of 2003  
Labour Relations Act No 66 of 1995  
Mines and Works Act 27 of 1956  
National Environmental Management Act 107 1998  
Occupational Health and Safety Act No. 85 of 1993  
Promotion of Access to Information Act No.2 of 2000  
Promotion of Equality and Prevention of Unfair Discrimination Act No. 4 of 2000  
Protection of Personal Information Act 4 of 2013  
Regulation of Interception of Communication and Provision of Communications Act, No.2 of 2000  
Regulation of Interception of Communications and Provisions of Communication Related Information Act No. 70 of 2002  
Skills Development Act 97 of 1998  
Value Added Tax Act No 89 of 1991

### **3 RECORDS AUTOMATICALLY AVAILABLE**

No notice has been submitted by the practice to the Minister of Justice and Constitutional Development regarding the categories of records, which are available without a person having to request access in terms of Section 52(2) of PAIA. However, the information on the website of the business is automatically available without having to request access in terms of PAIA.

### **4 SUBJECTS AND CATEGORIES OF RECORDS HELD BY CLICKON COMMUNICATIONS**

General information about ClickOn Communications can be accessed via the internet on [www.clickon.co.za](http://www.clickon.co.za), which is available to all persons who have access to the internet.

ClickOn Communications is a Pretoria based company specialising in the design and implementation of electronic visitor and residential access control systems to and from closed communities. All our products are designed and manufactured in-house, and we supply our services and equipment nationwide.

The subjects on which the company holds records and the categories on each subject in terms of Section 51(1)(e) are as listed below. Please note that a requester is not automatically allowed access to these records and that access to them may be refused in accordance with Sections 62 to 69 of the Act:

#### **A. COMPANIES ACT RECORDS**

- Documents of Incorporation;
- Memorandum of Incorporation;
- Minutes of meeting of the Board of Directors;
- Minutes of meetings of Shareholders;
- Proxy forms;
- 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;

**B. FINANCIAL RECORDS**

- Accounting Records;
- Annual Financial Reports;
- Annual Financial Statements;
- Banking details and bank accounts;
- Debtors / Creditors statements and invoices;
- Policies and procedures;
- Tax Returns;

**C. 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

**D. 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'.

**E. 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.

**F. SALES DEPARTMENT**

- Customer details;
- Credit application information;
- Information and records provided by a third party;

**G. MARKETING DEPARTMENT**

- Advertising and promotional material

**H. RISK MANAGEMENT AND AUDIT**

- Audit reports;
- Risk management frameworks; and
- Risk management plans.

**I. HEALTH SAFETY AND ENVIRONMENT**

- Complete Safety, Health and Environment Risk Assessment;
- Environmental Managements Plans;
- Inquiries, inspections, examinations by environmental authorities.

**J. IT DEPARTMENT**

- Computer / mobile device usage policy documentation;
- Disaster recovery plans;
- Information security policies/standards/procedures;
- Information technology systems and user manuals;
- Information usage policy documentation;
- System documentation and manuals.

**5 PURPOSE OF PROCESSING OF PERSONAL INFORMATION**

To support our systemic activities in access control;

To support sales and marketing activities;

To support recruitment and management of staff;

To support engagement with suppliers;

To support engagement with the general public;

To support engagement with investors and the media;

## **6 DATA SUBJECTS CATEGORIES AND THEIR PERSONAL INFORMATION**

- Customers: record of customer life cycle.
- Employees: record of employee life cycle.
- Suppliers: record of supplier life cycle.
- General public: tracking general enquiries and web site visits.
- Investors: records as maintained by the Company Secretary.
- Media: records of media interactions.

## **7 PLANNED RECIPIENTS OF PERSONAL INFORMATION**

- Statutory authorities;
- Employees of the company;
- Customers;
- Suppliers;
- Law enforcement;
- Tax authorities;
- Financial institutions;
- Medical schemes;
- Employee pension and provident funds;
- Industry bodies.

## **8 TRANS-BORDER FLOWS OF PERSONAL INFORMATION**

ClickOn does not have any trans-border flow of information. Should this situation change, then we would plan flows that can include:

- Flows to service providers/operators;
- Flows to business partners;
- Flows to customers;
- Flows to suppliers;
- Flows through the use of social media.

## **9 SECURITY MEASURES TO PROTECT PERSONAL INFORMATION**

- Physical security measures;
- Cyber security measures;
- Training in information security;
- Policies in information security;
- Audits of information security;
- Any particular security framework implemented.

## **10 DETAIL ON HOW TO MAKE A REQUEST FOR ACCESS**

It should be noted that any and all records, whether specifically listed herein or not, shall only be made available subject to the provisions of the Act.

### 10.1 Form of request

Internal and external correspondence between each member of ClickOn, its staff and customers, including letters, faxes, memos, emails and the like, to the extent that same are not covered by the records described in paragraph 4.

- A requester must use the form C to make a request for access to a record. This must be made to the designated head. This request must be made to the address, fax number or electronic mail address of the body concerned [s 53(1)].
- The requester must provide sufficient detail on the request form to enable the Information Officer to identify the record and the requester. The requester should also indicate which form of access is required and specify a postal address or fax number in the Republic of South Africa. The requester should also indicate if, in addition to a written reply, any other manner is to be used to inform the requester and state the necessary particulars to be so informed.
- The requester must identify the right that is sought to be exercised or protected and provide an explanation of why the requested record is required for the exercise or protection of that right.
- If a request is made on behalf of another person, the requester must submit proof of the capacity in which the requester is making the request to the satisfaction of the Information Officer.

### 10.2 Fees

A requester who seeks access to a record containing personal information about that requester is not required to pay the request fee. Every other requester, who is not a personal requester, must pay the required request fee:

- the Information Officer will by written notice require each requester (other than a personal requester) to pay the prescribed request fee (if any) before further processing any request.
- the fee that the requester must pay to a private body is R50, provided that the requester may lodge an application to the court against the tender or payment of the request fee.
- after the Information Officer has made a decision on the request, the requester will be notified in the required form. If the request is granted, then a further access fee must be paid for reproduction and for search and preparation and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure.

ClickOn Communications has the right to reject any request for information submitted in terms of Sections 62 to 70 of Chapter 4 of the PAIA Act.

**11 AVAILABILITY OF THE MANUAL**

This manual is available for inspection at the office of ClickOn Communications free of charge.



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**Signature of Designated Head**

**Danie le Roux (CEO)**

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**Name of Designated Head**

**20 February 2024**

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**Date of signature**

**Publication date of this manual: 20/02/2024**

**Next revision date of this document: 01/02/2025**



# FORM 2

## REQUEST FOR ACCESS TO RECORD

[Regulation 7]

**NOTE:**

1. Proof of identity must be attached by the requester.
2. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

**TO:** The Information Officer

Danie le Roux
1st Floor, ACACIA House,
Greenhill Village Office Park,
Botterklapper St.
Die Wilgers, Pretoria, 0184

(Address)

E-mail address:

Fax number:

Mark with an "X"

Request is made in my own name

Request is made on behalf of another person.

PERSONAL INFORMATION			
Full Names			
Identity Number			
Capacity in which request is made <i>(when made on behalf of another person)</i>			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile:
	Cellular:		
Full names of person on whose behalf request is made <i>(if applicable)</i> :			
Identity Number			
Postal Address			

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		

**PARTICULARS OF RECORD REQUESTED**

*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. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)*

Description of record or relevant part of the record:	

Reference number, if available	
--------------------------------	--

Any further particulars of record	

**TYPE OF RECORD**  
*(Mark the applicable box with an "X")*

Record is in written or printed form	
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	

<b>FORM OF ACCESS</b> <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

<b>MANNER OF ACCESS</b> <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(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)</i>	

<b>PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED</b>	
<i>If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.</i>	
Indicate which right is to be exercised or protected	

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

<b>FEES</b>	
a)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>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.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication <i>(Please specify)</i>

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_\_

\_\_\_\_\_  
**Signature of Requester / person on whose behalf request is made**

-----  
**FOR OFFICIAL USE**

<i>Reference number:</i>	
<i>Request received by: (State Rank, Name And Surname of Information Officer)</i>	
<i>Date received:</i>	
<i>Access fees:</i>	
<i>Deposit (if any):</i>	

\_\_\_\_\_  
**Signature of Information Officer**

**FORM 2**

**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 (ACT NO.  
4 OF 2013)**

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2017  
[Regulation 3(2)]**

*Note:*

1. *Affidavits or other documentary evidence in support of the request must 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.*

Reference Number....

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.

<b>A</b>		<b>DETAILS OF THE DATA SUBJECT</b>	
Surname:			
Full names:			
Identity number:			
Residential, postal or business address:			
			Code (    )
Contact number(s):			
Fax number:			
E-mail address:			
<b>B</b>		<b>DETAILS OF RESPONSIBLE PARTY</b>	
Name and surname of responsible party ( <i>if the responsible party is a natural person</i> ):			
Residential, postal or business address:			
			Code (    )
Contact number(s):			
Fax number:			
E-mail address:			

Name of public or private body (if the responsible party is not a natural person):	
Business address:	
	Code (    )
Contact number(s):	
Fax number:	
E-mail address:	
<b>C</b>	<b>REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT/*DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY. (Please provide detailed reasons for the request)</b>

\*        *Delete whichever is not applicable*

Signed at ..... this ..... day of .....20.....

.....  
*Signature of Data subject*

**FORM 3**  
**OUTCOME OF REQUEST AND OF FEES PAYABLE**  
 [Regulation 8]

Note:

1. If your request is granted the—
  - (a) amount of the deposit, (if any), is payable before your request is processed; and
  - (b) requested record/portion of the record will only be released once proof of full payment is received.
2. Please use the reference number hereunder in all future correspondence.

Reference number: \_\_\_\_\_

TO: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Your request dated \_\_\_\_\_, refers.

**1. You requested:**

Personal inspection of information at registered address of public/private body ( <i>including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form</i> ) is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure B.	
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**OR**

**2. You requested:**

Printed copies of the information ( <i>including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form</i> )	
Written or printed transcription of virtual images ( <i>this includes photographs, slides, video recordings, computer-generated images, sketches, etc</i> )	
Transcription of soundtrack ( <i>written or printed document</i> )	
Copy of information on flash drive ( <i>including virtual images and soundtracks</i> )	
Copy of information on compact disc drive ( <i>including virtual images and soundtracks</i> )	
Copy of record saved on cloud storage server	

**3. To be submitted:**

Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format ( <i>including transcriptions</i> )	
E-mail of information ( <i>including soundtracks if possible</i> )	
Cloud share/file transfer	
Preferred language: ( <i>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</i> )	

Kindly note that your request has been:

Approved

Denied, for the following reasons:

--

**4. Fees payable with regards to your request:**

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
Photocopy			
Printed copy			
For a copy in a computer-readable form on:			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor			
• If provided to the requestor	R60.00		
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record			
(i) Flash drive	R40.00		
• To be provided by requestor			
(ii) Compact disc	R40.00		
• If provided by requestor			
• If provided to the requestor	R60.00		
Postage, e-mail or any other electronic transfer:	Actual costs		
<b>TOTAL:</b>			

**5. Deposit payable (if search exceeds six hours):**

Yes

No

Hours of search	Amount of deposit (calculated on one third of total amount per request)

The amount must be paid into the following Bank account:

Name of Bank: \_\_\_\_\_  
 Name of account holder: \_\_\_\_\_  
 Type of account: \_\_\_\_\_  
 Account number: \_\_\_\_\_  
 Branch Code: \_\_\_\_\_  
 Reference Nr: \_\_\_\_\_  
 Submit proof of payment to: \_\_\_\_\_

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_\_

Danie le Roux  
 Information officer