



PAIA Manual

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended)

Geography	South Africa		
Scope	Corporate		
Owner	GP Legal		
Reviewed By	Antoine Williams, Director and Senior Counsel	Date:	January 2024
	Wasim Khan, Group Legal Counsel		
Reviewed By	Kelly Sprenkeling, Data Privacy Officer	Date:	January 2024
Approved By	Valderia Brunson, VP and Head of Legal	Date:	January 2024
Effective Date	24 January 2024		



1. List Of Acronyms And Abbreviations

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|-----|--------------------|---|
| 1.1 | "CEO" | Chief Executive Officer; |
| 1.2 | "DPO" | Data Privacy Officer – Information Officer that is solely responsible for requests related to personal information; |
| 1.3 | "IO" | Information Officer - Responsible for PAIA requests unless otherwise specified; |
| 1.4 | "Minister" | Minister of Justice and Correctional Services; |
| 1.5 | "PAIA" | Promotion of Access to Information Act No. 2 of 2000 (as amended); |
| 1.6 | "POPIA" | Protection of Personal Information Act No.4 of 2013; |
| 1.7 | "Regulator" | Information Regulator; |
| 1.8 | "Record" | a record in the possession or under the control of GP Strategies in its capacity as such. |

2. Introduction

- 2.1 GP Strategies is one of the world's leading talent transformation providers. By delivering award-winning learning and development solutions, we help organizations transform through their people and achieve meaningful change.
- 2.2 GP Strategies is committed to complying with its obligations under applicable laws and regulations in any jurisdiction where it has operations including South Africa. In compliance with Promotion of Access to Information Act ("PAIA"), GP Strategies has prepared this PAIA Manual to facilitate the public's access to information held by GP Strategies South Africa.
- 2.3 This PAIA Manual is relevant and has application for the subsidiaries of GP Strategies located in South Africa. In this PAIA Manual, any reference to **"GP Strategies South Africa"** includes all or any of the entities as listed below:
- 2.3.1 TTi Global Consultancy South Africa Proprietary Limited
Midlands Office Park West
Mount Quray Road
Midstream Estates
Centurion
0181

- 2.3 As of January 1, 2024, Lorien Engineering was divested from GP Strategies and is now wholly owned by NIRAS.
- 2.4 This PAIA Manual is designed for the benefit of individuals or legal persons that fall within the scope of PAIA.

3. Purpose Of PAIA Manual

The purpose of PAIA is to promote the right of access to information, to foster a culture of transparency and accountability within GP Strategies South Africa by giving the right to access 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.

This PAIA Manual can be used by members of the public to-

- 3.1 check the categories of records held by GP Strategies South Africa which are available without a person having to submit a formal PAIA request;
- 3.2 have a sufficient understanding of how to make a request for access to a record of GP Strategies South Africa, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 3.3 know the description of the records of GP Strategies South Africa which are available in accordance with any other legislation;
- 3.4 access all the relevant contact details of the IO and DPO who will assist the public with the records they intend to access;
- 3.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 3.6 know if GP Strategies South Africa will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 3.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 3.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 3.9 know if GP Strategies South Africa has planned to transfer or process personal information outside the Republic of South Africa and the recipients or

categories of recipients to whom the personal information may be supplied;
and

- 3.10 know whether GP Strategies South Africa has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

4. Key Contact Details For Access To Information Of GP Strategies South Africa

4.1 Information Officer related to subject matters other than Personal Information

Name: Tania Cleary
Tel: +27 82 655 4734
Email: tcleary3@gpstrategies.com

4.2 Data Privacy Officer

Name: Kelly Sprenkeling
Tel: (+1) 443.857.3224
Email: dataprivacy@gpstrategies.com

4.3 National or Head Office

Postal Address: Co-Work at Midstream
Midlands Office Park West
Mount Quray Road
Midstream Estate
Centurion
0181

Physical Address: Co-Work at Midstream
Midlands Office Park West
Mount Quray Road
Midstream Estate
Centurion
0181

Telephone: 012 665 0245
Email: info@gpstrategies.com
Website: www.gpstrategies.com

5. Guide On How To Use PAIA And How To Obtain Access To The Guide

- 5.1 The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised guide on how to use PAIA ("**Guide**"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.
- 5.2 The Guide is available in each of the official languages and in braille.
- 5.3 The aforesaid Guide contains the description of-
- 5.3.1 the objects of PAIA and POPIA;
 - 5.3.2 the postal and street address, phone and fax number and, if available, electronic mail address
 - 5.3.3 the manner and form of a request for-
 - 5.3.3.1 access to a record of a public body contemplated in section 11¹; and
 - 5.3.3.2 access to a record of a private body contemplated in section 50²;
 - 5.3.4 the assistance available from the IO of a public body in terms of PAIA and POPIA;
 - 5.3.5 the assistance available from the Regulator in terms of PAIA and POPIA;
 - 5.3.6 all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-
 - 5.3.6.1 an internal appeal;
 - 5.3.6.2 a complaint to the Regulator; and
 - 5.3.6.3 an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;

¹ Section 11(1) of PAIA- A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

² Section 50(1) of PAIA- A requester must be given access to any record of a private body if-

- a) that record is required for the exercise or protection of any rights;
- b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and
- c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

- 5.3.7 the provisions of sections 14³ and 51⁴ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 5.3.8 the provisions of sections 15⁵ and 52⁶ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 5.3.9 the notices issued in terms of sections 22⁷ and 54⁸ regarding fees to be paid in relation to requests for access; and
- 5.3.10 the regulations made in terms of section 92⁹.
- 5.3.11 Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.
- 5.3.12 The Guide can also be obtained-
- 5.3.12.1 upon request to the Information Officer;
- 5.3.12.2 from the website of the Regulator
(<https://www.justice.gov.za/inforeg/>).
- 5.3.13 A copy of the Guide is also available in English, Zulu and Afrikaans, for public inspection during normal office hours.

³ Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

⁴ Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

⁵ Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

⁶ Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

⁷ Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

⁸ Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

⁹ Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

- (a) any matter which is required or permitted by this Act to be prescribed;
- (b) any matter relating to the fees contemplated in sections 22 and 54;
- (c) any notice required by this Act;
- (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- (e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

6. Categories Of Records Of GP Strategies South Africa Which Are Available Without A Person Having To Request Access

Category of records	Types of the Record	Available on Website	Available upon request
Publication	<ul style="list-style-type: none"> • Advertising • Marketing material • Newsletters • Press releases • Social media posts • Online content from GP Strategies' website • Privacy notice 	X	X

7. Description Of The Records Of GP Strategies South Africa Which Are Available In Accordance With Any Other Legislation

Category of Records	Applicable Legislation
Memorandum Of Incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Records of Personal Information	Protection of Personal Information Act 4 of 2013
Security Information	<ul style="list-style-type: none"> • Promotion of Access to Information Act 2 of 2000 • Protected Disclosures Act 26 of 2000 • Protection of Personal Information Act 4 of 2013
Employment Information	<ul style="list-style-type: none"> • Basic Conditions of Employment Act 75 of 1997 • Broad-Based Black Economic Empowerment Act 53 of 2003

	<ul style="list-style-type: none"> • Compensation for Occupational Injuries and Diseases Act 130 of 1993 • Employment Equity Act 55 of 1998 Labour Relations Act 66 of 1995 • Skills Development Act 97 of 1998 Unemployment Insurance Act 63 of 2001
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8. Description Of The Subjects On Which GP Strategies South Africa Holds Records And Categories Of Records Held On Each Subject By GP Strategies South Africa

- 8.1. The records reflected in the table below may be formally requested, in terms of the PAIA, but parts, or the whole, of the record may be subject to the grounds for refusal of access to records. For additional background, please refer to the Guide referenced in Section 5.1 above.
- 8.2. GP Strategies South Africa reserves the right to refuse access to records if the processing of the record will substantially, and unreasonably, result in a diversion of its resources.
- 8.3. GP Strategies South Africa reserves the right to refuse access to records that relate to the mandatory protection (under the PAIA) including without limitation of:
- 8.3.1. privacy of a third party, who is a natural person or a deceased person or a juristic, which would involve the unreasonable disclosure of personal information of that natural person, deceased person, or juristic;
- 8.3.2. commercial information of a third party, if the record contains trade secrets of the third party; financial, commercial, or technical information, which disclosure may cause harm to the financial or commercial, interests of the third party; and information disclosed in confidence by a third party to GP Strategies South Africa, if the disclosure may place the third party at a disadvantage;
- 8.3.3. confidential information of a third party, if it is protected in terms of an agreement or legislation;
- 8.3.4. safety of natural persons, and the protection of property;
- 8.3.5. records that are regarded as privileged, in legal proceedings; and

8.3.6. records that are personal information, in terms of the POPIA commercial activities of GP Strategies South Africa, including, but not limited to, trade secrets, financial, commercial, or technical information (which, if disclosed could likely cause harm to the financial or commercial interests of GP Strategies South Africa), research information or other information (which, if disclosed could put GP Strategies South Africa at a disadvantage in negotiations or commercial competition), and software platforms, or programs, developed for GP Strategies South Africa.

8.4 GP Strategies South Africa will also refuse access if the requests are frivolous and/or vexatious.

8.5 All requests for information will be assessed on their own merits and in accordance with the applicable legal principles and legislation.

8.6 The IO, or DIO, may grant access to a record if disclosing the record would reveal evidence of a material contravention of, or failure to comply with, any law, and the public interest in disclosing the record outweighs the harm contemplated in the relevant grounds for refusal of access to records.

Subjects on which GP Strategies South Africa holds records	Categories of records
Strategic Documents, Plans, Proposals	Annual Financial Statements, Strategic Plan, Annual Budget
Human Resources	<ul style="list-style-type: none"> - HR policies and procedures - Advertised posts - Employees records - Job applicant information - Payroll information - Insurance Information
Accounting	<ul style="list-style-type: none"> - Payment information: Management Accounts, Invoices, Purchase Orders, Bank Statements, Purchase Requisitions, Receipts, Expense Claims
Website	<ul style="list-style-type: none"> - Cookie information in accordance with website statements
Service Providers and Suppliers	<ul style="list-style-type: none"> - Supplier Records - Insurance Documentation
Clients, Potential Clients	<ul style="list-style-type: none"> - Client records

9. Processing Of Personal Information

9.1 Purposes of Processing Personal Information

GP Strategies South Africa provides talent transformation to its clients by providing design, development, and delivery of training, learning management systems, related leadership training and consulting, and administrative support services for training courses, services and systems. To carry out its business, GP Strategies South Africa will process personal information for various purposes including but not limited to:

- 9.1.1 To fulfil its obligations under a contract. For example, GP Strategies South Africa may be required to process personal information on behalf of its clients in the provision of its training services;
- 9.1.2 To monitor its website performance and to optimized user experience. GP Strategies South Africa collects limited categories of personal information for temporary periods from individuals that visit its web and social media sites;
- 9.1.3 To comply with application laws and regulations;
- 9.1.4 To manage employment and other personnel information. GP Strategies South Africa is required by law to collect, store and process employee personal information. The majority of the employee data is used in support of central administrative processing for employee payroll and benefits administration, for example, to record employee taxes, provide human resources benefits, travel expense reimbursements and provide payroll processing; and/or
- 9.1.5 To facilitate marketing activities. Contact details of employees of customers and prospective customers may be stored in marketing contact files/systems and sent marketing information.

9.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Categories of Data Subjects	Personal Information that may be processed
Employees and Former employees (rolling retention)	Name and surname, address, contact details, date of birth, place of birth, Identity Document/Passport Documents, Educational Qualification Documents, bank details, Job Description, Employee Resume, tax number and financial information; credit history; Employee Tax Documents, Employee Payslips, Provident Fund Documents, Medical Aid

Categories of Data Subjects	Personal Information that may be processed
	Documents, Marriage Certificate, Employee Emergency Contact Number, Employee Photograph, medical records for underwriting, claims and insurance purposes; nationality; citizenship; residency status; sensitive or special categories of personal information, such as criminal behaviour.
Visitors	Name and surname, email address, person to visit and signature.
Job Applicants	Name and surname, address, contact details, Email Address and Resume
Service Providers	Names, registration number or identity numbers, VAT numbers, address and banking details, Service Level Agreements, Accounting Documents
Customers / Clients	Name and surname, address, registration numbers or identity numbers, and banking details, Service Level Agreements, Accounting Documents
Website visitors	IP address, browsing information, forms

9.3 The recipients or categories of recipients to whom the personal information may be supplied

Category of Data Subject	Category of Personal Information	Recipient or Categories of Recipients to whom the personal Information may be supplied.
Employees, Suppliers, Clients	Name, email address and other relevant details for services delivery	Other Entities within the GP Strategies Group, Clients and Suppliers
Employees	Personal and Employment Information, including payroll information	Other Entities within the GP Strategies Group
Employees	Tax Information	Local Tax Authorities and governmental or administrative bodies
Employees	Personal and contribution information	Pension fund institutions
Employees	Personal and Claim information	Insurance Companies

Category of Data Subject	Category of Personal Information	Recipient or Categories of Recipients to whom the personal Information may be supplied.
Employees	Personal and medical information	Benefit providers
Employees	Identity Document and Name and Surname, for background checks, Criminal Checks, Qualification Verifications	Authorized Verification Agents
Employees	Personal information related to payroll information	Payroll provider
Employees, Former employees, Suppliers and Clients	Personal, trade and account information	Administrators and Technology Systems Service Providers
Employees, Suppliers and Clients	Personal Information relating to accounts/products/services offered	Independent accountants and auditors and authorised representatives of internal control functions such as audit, legal and information security
Employees	Passport Document	Travel service provider, Administrative Bodies
Job applicants	Name, address, contact information and CV	Other Entities within the GP Strategies Group, Administrators and Technology Systems Service Providers
Website visitors	IP Address, browsing information	Technology Systems Service Providers per cookie statement on website.
Website visitors completing forms	Name, phone number, email address	Other Entities within the GP Strategies Group, Administrators and Technology Systems Service Providers

9.4 Planned transborder flows of personal information

Personal Information such as account numbers and/or contact information may be sent to countries in other jurisdictions for the provision of IT hardware and software services, travel arrangements by our travel service provider or collaboration between different GP Strategies South Africa entities in other jurisdictions. These may include Argentina, Australia, Brazil, Canada, Chile, China, Colombia, Egypt, the EU, Hong Kong,

India, Japan, Malaysia, Mexico, South Korea, Switzerland, Taiwan, Thailand, Turkey, United Arab Emirates, United Kingdom and/or the United States of America. We may also transfer Personal Information to sub-processors outside of South Africa for the purpose of performing certain services. All transfers of Personal Information outside of South Africa are done in accordance with Section 72 of POPIA.

9.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

GP Strategies South Africa has established, and maintains, suitable technical, and operational measures to prevent loss of, damage to, or unauthorised destruction of, personal information, and unlawful access to, or processing of, personal information. Below are examples of security measures GP Strategies South Africa has implemented. This list is in no way intended to provide a comprehensive overview, but touches upon important principles:

- Following generally accepted industry standards to protect and encrypt the personal information submitted to it, both during transmission and once we receive it.
- When anyone enters sensitive information (such as log in credentials), GP Strategies South Africa encrypts the transmission of that information using secure transport layer security (TLS).
- Maintaining strict access controls.
- Configured firewalls and intrusion detection systems.
- Implemented recommended hardening and patching procedures.
- Maintaining malware protection.
- Maintaining back-up and restoration policies.

No method of data transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, GP Strategies South Africa cannot guarantee its absolute security.

9.6 Data subject rights with respect to personal information

A data subject, having provided adequate proof of identity, has the right to have his, her or its personal information processed in accordance with the conditions for the lawful processing of personal information, including:

- to be notified that personal information about him, her or it is being collected; or
- his, her or its personal information has been accessed or acquired by an unauthorised person;
- request a responsible party to confirm, free of charge, whether or not the responsible party holds personal information about the data subject;

- to establish whether a responsible party holds personal information of that data subject and to request access to his, her or its personal information;
- to correct or delete personal information about the data subject that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully; or
- to object, on reasonable grounds relating to his, her or its particular situation to the processing of his, her or its personal information, at any time for purposes of direct marketing; or in terms of section 69(3)(c) of POPIA,;
- not to have his, her or its personal information processed for purposes of direct marketing by means of unsolicited electronic communications except as referred to in section 69(1) of POPIA;
- not to be subject, under certain circumstances, to a decision which is based solely on the basis of the automated processing of his, her or its personal information intended to provide a profile of such person;
- to submit a complaint to the Regulator regarding the alleged interference with the protection of the personal information of any data subject or to submit a complaint to the Regulator in respect of a determination of an adjudicator as provided for in POPIA; and
- to institute civil proceedings regarding the alleged interference with the protection of his, her or its personal information request from a responsible party the record or a description of the personal information about the data subject held by the responsible party, including information about the identity of all third parties, or categories of third parties, who have, or have had access to the information within a reasonable timeframe, at a prescribed fee (may depend on scope or nature of the request), if any, in a reasonable manner and format, and in a form that is generally understandable.

10. Availability Of The Manual

- 10.1 A copy of the Manual is available-
- 10.1.1 on www.gpstrategies.com;
 - 10.1.2 head office of the GP Strategies South Africa for public inspection during normal business hours;
 - 10.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and
 - 10.1.4 to the Information Regulator upon request.
- 10.2 A fee for a copy of the Manual shall be payable per each A4-size photocopy made.

11. Fees

- 11.1 Fees Provided by PAIA. The PAIA provides for two types of fees, namely:
- 11.1.1 A request fee, which is a form of administration fee to be paid by all requesters except personal requesters, before the request is considered. The request fee is not refundable; and
 - 11.1.2 An access fee, which is paid by all requesters if a request for access is granted. This fee is inclusive of costs involved by GP Strategies South Africa in obtaining and preparing a record for delivery to the requester.
- 11.2 When the request is received by the IO, 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.
- 11.3 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 IO 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.
- 11.4 The Information Officer shall withhold a record until the requester has paid the fees as indicated below.
- 11.5 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.
- 11.6 If a deposit has been paid in respect of a request for access, which is refused, then the IO concerned must repay the deposit to the requester.
- 11.7 Reproduction Fees. Where GP Strategies South Africa 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.

- 11.8 Request Fees. Where a requester submits a request for access to information held by GP Strategies South Africa on a person other than the requester himself/herself, a request fee in the amount of R140.00 plus relevant delivery fees are payable up-front before GP Strategies South Africa will further process the request received.
- 11.9 Access Fees. 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 PAIA or an exclusion is determined by the Minister in terms of section 54(8).


12. Decision

- 12.1 GP Strategies South Africa will, within 30 (thirty) days of receipt of a valid request with sufficient details, decide whether to grant or decline the request and give notice with reasons (if required) to that effect.
- 12.2 The thirty (30) day period within which GP Strategies South Africa 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 GP Strategies South Africa and the information cannot reasonably be obtained within the original thirty (30) day period.
- 12.3 GP Strategies South Africa will notify the requester in writing should an extension be sought.

13. Updating Of The Manual

GP Strategies South Africa will on a regular basis update this manual.

Issued by **TTi Global Consultancy South Africa Proprietary Limited**

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William J. Maggio
Director