

**LUND FARMS
PROPRIETARY LIMITED**
REGISTRATION NUMBER 1974/003681/07
(hereinafter referred to as "the Company")

PAIA MANUAL

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

1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	“Company”	Lund Farms Proprietary Limited, registration number 1974/003681/07
1.2	“Group”	Kuipers Group (Pty) Ltd and its subsidiary companies, each of which is a separate private body with its own PAIA manual
1.3	“Data subject”	The person to whom personal information relates
1.4	“Information Officer”	The head of the Company, or the person authorised by the head to act as Information Officer, as set out in clause 3
1.5	“Deputy Information Officer”	The person designated under section 17 of PAIA and section 56 of POPIA, as set out in clause 3
1.6	“PAIA”	Promotion of Access to Information Act 2 of 2000, as amended
1.7	“PAIA Regulations”	Regulations relating to the Promotion of Access to Information, 2021 (GN R.757 in Government Gazette 45057 of 27 August 2021)
1.8	“POPIA”	Protection of Personal Information Act 4 of 2013
1.9	“Personal information”	As defined in section 1 of POPIA
1.10	“Personal requester”	A requester seeking access to a record containing personal information about the requester
1.11	“Record”	Any recorded information, regardless of form or medium, in the Company's possession or under its control, whether or not the Company created it
1.12	“Regulator”	The Information Regulator established under section 39 of POPIA
1.13	“Requester”	Any person, including a public body or its official, requesting access to a record of the Company, or a person acting on their behalf

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 know if the body 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;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 know if the body 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
- 2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF THE COMPANY

3.1. Information Officer

Name:	Diederick Viljoen Pretorius
Tel:	012 819 7914
Email:	cs@kuipersgroup.co.za
Fax number:	086 635 9717

3.2. Deputy Information Officer

Name: Marguerite Smit
Tel: 012 819 7914
Email: info@kuipersgroup.co.za
Fax Number: 086 248 8808

3.3 Head Office

Postal Address: Postnet Suite 307, Private Bag X 4, Wierda Park, Gauteng, 0149
Physical Address: Portion 272 Zeekoegat, Protea Street, Roodeplaat, Pretoria, Gauteng, 0039
Telephone: 012 819 7914
Website: www.lundeggs.co.za

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

- 4.1. 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.
- 4.2. The Guide is available in each of the official languages and in braille.
- 4.3. The aforesaid Guide contains the description of-
- 4.3.1. the objects of PAIA and POPIA;
 - 4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-
 - 4.3.2.1. the Information Officer of every public body, and
 - 4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
 - 4.3.3. the manner and form of a request for-

¹ Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

² Section 56(a) of POPIA- *Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

- 4.3.3.1. access to a record of a public body contemplated in section 11³; and
- 4.3.3.2. access to a record of a private body contemplated in section 50⁴;
- 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.6. 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-
 - 4.3.6.1. an internal appeal;
 - 4.3.6.2. a complaint to the Regulator; and
 - 4.3.6.3. 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;
- 4.3.7. the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.8. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

³ 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.

⁴ 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 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.

⁶ 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.

⁷ 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

⁸ 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

- 4.3.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92¹¹.
- 4.4. 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.
- 4.5. The Guide can also be obtained-
 - 4.5.1. upon request to the Information Officer;
 - 4.5.2. from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).
- 4.6. A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-
 - 4.6.1 English
 - 4.6.2 Afrikaans

5. CATEGORIES OF RECORDS OF THE COMPANY WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

- 5.1. The Company makes some records and/or information available without a request for access in terms of PAIA. The below mentioned may be requested via e-mail:
 - 5.1.1. Banking details
 - 5.1.2. Registration documents
 - 5.1.3. Directors' names
 - 5.1.4. Memorandum of Incorporation

⁹ 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.

¹⁰ 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.

¹¹ 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. DESCRIPTION OF THE RECORDS OF THE COMPANY WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION, INCLUDING AMENDED ACTS WHERE APPLICABLE

Category of Records	Applicable Legislation
Anti-corruption and organised crime	• Prevention & Combating of Corrupt Activities Act 12 of 2004 • Prevention of Organised Crime Act 121 of 1998 • Protection of Constitutional Democracy against Terrorist and Related Activities Act 33 of 2004
Communications and IT	• Electronic Communications Act 36 of 2005 • Electronic Communications and Transactions Act 25 of 2002 • Financial Intelligence Centre Act 38 of 2001 • Regulation of Interception of Communications and Provision of Communication related Information Act 70 of 2002
Compliance and Corporate Governance	• Companies Act 71 of 2008 • Competition Act 89 of 1998
Copyright, Intellectual Property and Trademarks	• Copyright Act 98 of 1978 • Intellectual Property Laws Amendment Act 38 of 1997 • Intellectual Property Laws Amendment Act 28 of 2013 • Trademarks Act 194 of 1993
Finance	• Income Tax Act 58 of 1962 • Insolvency Act 24 of 1936 • National Credit Act 34 of 2005 • Tax Administration Act 28 of 2011 • Value Added Tax Act 89 of 1991
General	• Consumer Protection Act 68 of 2008 • Prescription Act 18 of 1943 • Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000 • Promotion of Access to Information Act, No 2 of 2000 • Protection of Personal Information Act 4 of 2013
Human Resources	• Basic Conditions of Employment Act 75 of 1997 • Broad Based Black Economic Empowerment Act 53 of 2003 • Compensation for Occupational Injuries and Disease Act 130 of 1993 • Employment Equity Act 55 of 1998 • Labour Relations Act 66 of 1995 • Occupational Health and Safety Act 85 of 1993 • Protected Disclosures Act 26 of 2000 • Skills Development Act 97 of 1998 • Skills Development Levies Act 9 of 1999 • Unemployment Insurance Act 63 of 2001 • Unemployment Insurance Contributions Act 4 of 2002

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE COMPANY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY THE COMPANY

Subjects on which the body holds records	Categories of records
Financial records	• Accounting Records • Asset Registers • Bank Statements • Details of auditors • Invoices • Financial statements • Reports • Banking details and bank account records • Debtors/creditors statements and invoices • Budgets • Management accounts
Client records	• Receipts • Correspondence • Service agreements
Human Resources records	• Employee information • Pension records • Personnel files • Policies and Procedures • Employment agreements • Workplace and Union agreements and documents • Benefit arrangements • Attendance registers • Disciplinary records • Salary records • Leave records • Training records and manuals • Internal evaluation records • Pension records
Information technology records	• System documentation and manuals • Project, disaster recovery and implementation plans • Licencing documentation
Insurance records	• Insurance policies • Insurance claim history
Occupational Health & Safety records	• Policies and procedures • Recorded work-related incidents
Property records	• Title Deeds • Lease Agreements

Subjects on which the body holds records	Categories of records
	• Hire Agreements • Credit Sale agreements • Asset registers
Secretarial Statutory records	• Company registration document and statutes • Records relating to the appointment of directors, auditors and other officers • Registers • Legal Compliance Records • Minutes of meetings • Share certificates • Statutory returns
Service Provider / Supplier / Contractor records	• Name of supplier • Description of goods/service • Supplier registration details • Supplier contact details and address • Supplier banking details
Taxation	• Income tax files • Documents issued to employees for income tax purposes • Pay-as-you-earn (PAYE) records • Documents issued to employees for income tax purposes • Records of payments made to the South African Revenue Services • Value Added Tax records • Skill development levies • Unemployment insurance fund

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

8.1.1 Providing management, financial, HR, IT and administrative services to group companies;

8.1.2 Recruiting, employing and remunerating staff, and administering benefits;

8.1.3 Procuring goods and services and managing supplier relationships;

8.1.4 Managing customer accounts, credit and debt collection;

8.1.5 Complying with tax, labour, health and safety, company and other legal obligations;

8.1.6 Protecting people, property and animal health through access control, biosecurity and security monitoring; and

8.1.7 Establishing, exercising or defending legal claims.

8.2 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
Customers (individuals and juristic persons)	Names, registration or ID numbers, contact details, credit information, account and transaction history
Directors and shareholders	Names, registration or ID numbers, contact details, shareholding
Employees and job applicants	Names, ID numbers, contact details, qualifications, employment history, remuneration, bank details, tax numbers, medical and disability information, race and gender (for employment equity), criminal record checks, disciplinary records
Group companies	Registration details, financial and operational information
Suppliers and service providers	Names, registration numbers, contact persons, VAT numbers, B-BBEE status, bank details
Visitors	Names, ID numbers, vehicle registration numbers, biosecurity declarations, CCTV images (where applicable)

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

8.3.1 Other companies in the Kuipers Group, for shared services;

8.3.2 SARS, the Department of Employment and Labour, CIPC, the Compensation Fund and other regulators, as required by law;

8.3.3 Auditors, attorneys and other professional advisers;

8.3.4 Banks, payroll providers, medical aid, pension and provident funds, and insurers;

8.3.5 IT, cloud hosting and security service providers; and

8.3.6 Credit bureaus and debt collectors.

Operators who process personal information for the Company do so under written agreements that require them to protect it.

8.4 Planned transborder flows of personal information

The Company does not plan to transfer personal information outside South Africa.

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

The Company takes appropriate, reasonable technical and organisational measures to secure the integrity and confidentiality of personal information, as required by section 19 of POPIA. These include:

- 8.5.1 access controls, unique user credentials and role-based permissions;
- 8.5.2 firewalls, antivirus and patch management;
- 8.5.3 regular backups and a disaster recovery plan;
- 8.5.4 encryption of laptops and of data in transit where appropriate;
- 8.5.5 physical security of offices and records storage; and
- 8.5.6 confidentiality undertakings from employees and operator agreements with service providers.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

- 9.1.1 on www.lundeggs.co.za;
- 9.1.2 at the registered address and the head office of the Company for public inspection during normal business hours;
- 9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and
- 9.1.4 to the Information Regulator upon request.

9.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

10. UPDATING OF THE MANUAL

The Company will, on a regular basis, update this manual.

Approved by



Diederick Viljoen Pretorius

Information Officer

29 October 2024