



**Brombacher  
& Associates**

# **PAIA MANUAL**

**Prepared in terms of section 51 of the  
Promotion of Access to Information Act  
2 of 2000**

**DATE: 24/11/2022**

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## 1. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to:

- 1.1. check the categories of records held by Brombacher and Associates (B&A) which are available without a person having to submit a formal PAIA request;
- 1.2. have a sufficient understanding of how to make a request for access to the records of B&A, by providing a description of the subjects on which B&A holds records and the categories of records held on each subject;
- 1.3. know the description of the records of B&A which are available in accordance with any other legislation;
- 1.4. access all the relevant contact details of the Information Officer (IO) and Deputy Information Officer (DIO) who will assist the public with the records they intend to access;
- 1.5. know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 1.6. know if B&A 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;
- 1.7. know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 1.8. know the recipients or categories of recipients to whom the personal information may be supplied;
- 1.9. know if B&A has planned to transfer or process personal information outside the Republic of South Africa (RSA) and the recipients or categories of recipients to whom the personal information may be supplied; and

- 1.10. know whether B&A has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

## 2. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF B&A

### 2.1. Chief Information Officer

Name: Aarnout Brombacher  
Tel: +27217063777  
Email: [aarnout@brombacher.co.za](mailto:aarnout@brombacher.co.za)

### 2.2. Deputy Information Officer

Name: Melanie Gow  
Tel: +27217063777  
Email: [melanie@brombacher.co.za](mailto:melanie@brombacher.co.za)

### 2.3. Access to information general contacts

Email: [info@brombacher.co.za](mailto:info@brombacher.co.za)

### 2.4. National or Head Office

Postal and Physical Address:

Unit E23, Prime Park, Mocke Road, Diepriver, 7800

Telephone: +27217063777

Email: [info@brombacher.co.za](mailto:info@brombacher.co.za)

Websites: [www.Brombacher.co.za](http://www.Brombacher.co.za)  
[www.NumberSense.co.za](http://www.NumberSense.co.za)  
[www.GeoGenius.co.za](http://www.GeoGenius.co.za)  
[www.MathsSense.co.za](http://www.MathsSense.co.za)

### 3. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

- 3.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Manual on how to use PAIA, 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.
- 3.2. The Manual is available in English and can be requested in the other official languages.
- 3.3. The aforesaid Manual contains the description of:
  - 3.3.1. the objects of PAIA and POPIA;
  - 3.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of:
    - 3.3.2.1. the IO, and
    - 3.3.2.2. the DIO in terms of section 17(1) of PAIA<sup>1</sup> and section 56 of POPIA<sup>2</sup>;
  - 3.3.3. the manner and form of a request for:
    - 3.3.3.1. access to a record of a public body contemplated in section 11<sup>3</sup>; and
    - 3.3.3.2. access to a record of a private body contemplated in section 50<sup>4</sup>;

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<sup>1</sup> 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.*

<sup>2</sup> 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.*

<sup>3</sup> 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.*

<sup>4</sup> 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;*

- 3.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 3.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 3.3.6. 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:
  - 3.3.6.1. an internal appeal;
  - 3.3.6.2. a complaint to the Regulator; and
  - 3.3.6.3. 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;
- 3.3.7. the provisions of sections 14<sup>5</sup> and 51<sup>6</sup> requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 3.3.8. the provisions of sections 15<sup>7</sup> and 52<sup>8</sup> providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

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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.

<sup>5</sup> Section 14(1) of PAIA- The information officer of a public body must, in English (other languages available on request), make available a manual containing information listed in paragraph 4 above.

<sup>6</sup> 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.

<sup>7</sup> 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

<sup>8</sup> 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

- 3.3.9. the notices issued in terms of sections 22<sup>9</sup> and 54<sup>10</sup> regarding fees to be paid in relation to requests for access; and
  - 3.3.10. the regulations made in terms of section 92<sup>11</sup>.
- 3.4. Members of the public can inspect or make copies of the Manual from the offices of B&A during normal working hours.
- 3.5. The Guide can also be obtained:
- 3.5.1. upon request to the IO;
  - 3.5.2. from the websites on [www.Brombacher.co.za](http://www.Brombacher.co.za); [www.NumberSense.co.za](http://www.NumberSense.co.za); [www.GeoGenius.co.za](http://www.GeoGenius.co.za)
  - 3.5.3. A copy of the Manual is also available in English, for public inspection during normal office hours:

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<sup>9</sup> 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.

<sup>10</sup> 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.

<sup>11</sup> 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.”

## 4. PROCESSING OF PERSONAL INFORMATION

### 4.1. Purpose of Processing Personal Information

#### HOW B&A COLLECTS INFORMATION

- DIGITAL
  - Cookies
  - Newsletter sign-up form
  - Contact us form
  - Registration form
  - Checkout process: User information collected at checkout

- COOKIES

We store cookies on our users' computer to identify that they have been to our sites before. We do not use third party cookies to track data. Our sites have a Cookie banner with an option to accept only certain cookies or disallow all cookies. Our sites use Google Tag Manager to ensure that, if users do not accept the cookies, their data is not tracked by our sites.

#### HOW B&A USES INFORMATION

- To enable us to ensure our users' online account has been created and updated successfully so that they safely and securely access the content they have purchased or registered for.
- To communicate with our users regarding their purchase and/or subscription.
- To respond to specific enquiries and queries.
- To notify our users about changes to our service.
- To ensure that content from our sites is presented in the most effective manner for our users and their computers.
- For preventing and detecting fraudulent or criminal activity.
- To communicate with our users regarding product developments and support workshops:
  - If our users have given us their consent to receive marketing communications by email, are a customer of ours or they have previously asked us for information about our products or workshops, we may send them marketing messages by email. However, in every marketing email message we send our users, we give them the opportunity to unsubscribe from our mailings altogether.



#### **4.2. Description of the categories of Data Subjects and of the information or categories of information relating thereto**

##### WHAT INFORMATION DO OUR WEBSITES COLLECT?

If just browsing our sites, our servers and cookies collect the following generic information about our users:

- The operating system in use e.g. Windows
- The browser in use e.g. Safari or Google Chrome
- The device in use to view this website e.g. Desktop or Mobile
- The IP Address
- Our users' behaviour on our sites e.g. page views, link clicks etc.

Only when voluntarily completing a form on the sites, do we then have access to the following information:

- E-mail address
- First & last name
- Full address (if we are required to send any physical products)

Please Note: At no point do we process and/ or store any bank or credit card information.

#### **4.3. The recipients or categories of recipients to whom the personal information may be supplied**

##### DISCLOSURE OF INFORMATION

We do not sell, trade, or otherwise transfer to outside parties personally identifiable information. We may also release our user information when we believe release is appropriate to comply with law, enforce our site policies, or protect our or others' rights, property or safety.

The users have the right at any time to ask us not to process their personal data for marketing purposes. Users can also unsubscribe from our marketing Newsletter at any point by clicking on the 'Unsubscribe' link at the bottom of any marketing Newsletter they have received from us.

From a data retention perspective, we are legally bound from a financial viewpoint to keep our users' personal data on our systems for seven years after they have made a purchase.

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

##### ACCESSING INFORMATION

Our users have the right to check that their personal data is being processed lawfully. Their subject access right can be exercised in accordance with the act. Any subject access request must be made in writing to [info@brombacher.co.za](mailto:info@brombacher.co.za)

If our users would like amendments made to their data e.g. change of name or contact details, they may contact us at any time via [info@brombacher.co.za](mailto:info@brombacher.co.za)

##### DATA SECURITY

The transmission of information via the internet is not completely secure, and although we will do our best to protect user personal data, we cannot guarantee the security of user data transmitted to this web site, therefore any transmission is at the users' own risk.

Once we have received the users' information, we will take all reasonable steps to keep their personal data secure (both technologically and physically) and to try to prevent any unauthorised access to it. All information they provide to us is stored on our secure servers. All payment transactions will be encrypted using SSL technology and processed through PayFast. We do NOT store any financial information.

Where we have given the users (or where they have chosen) a password, which enables them to access certain parts of our sites, the users are responsible for keeping that password confidential. We ask our users not to share a password with anyone.

## 5. AVAILABILITY OF THE MANUAL

5.1. A copy of the Manual is available:

5.1.1. on the following B&A websites:

- [www.Brombacher.co.za](http://www.Brombacher.co.za);
- [www.NumberSense.co.za](http://www.NumberSense.co.za);
- [www.GeoGenius.co.za](http://www.GeoGenius.co.za)

5.1.2. at the head office of B&A for public inspection during normal business hours;

## 6. UPDATING OF THE MANUAL

The head of B&A will on a regular basis update this manual.

*Issued by:*

A handwritten signature in black ink, appearing to be 'A. Brombacher', written over a faint circular stamp or watermark.

**Aarnout Brombacher**

**29 November 2022**