



## **CAST PRODUCTS SOUTH AFRICA (PTY) LTD**

(Registration Number: 2017/057592/07)

Published in terms of:

Section 51 of the

**Promotion of Access to Information Act 2 of 2002**

And

Sections 11 and 24 of the

**Protection of Personal Information Act 4 of 2013**

## 1. INTRODUCTION:

Cast Products South Africa (Pty) Ltd (“CPSA”) is an industry leader with exceptional expertise in creating quality cast products used in the mining, railway, power and general engineering industries. Cast Products South Africa originates from the Scaw Metals Group and has now been corporatized.

This PAIA and POPIA Manual (“Manual”) provides an outline of the type of records and the personal information it holds and explains how to submit requests for access to these records in terms of the Promotion of Access to Information Act (2 of 2000) (“PAIA”). In addition, it explains how to object to the processing of personal information held by the Company, or request for correction or deletion of the personal information, in terms of Sections 11 and 24 of the Protection of Personal Information Act (4 of 2013) (“POPIA”).

The PAIA and POPIA Acts give effect to everyone’s constitutional right of access to information held by private sector or public bodies, if the record or personal information is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest.

Requests shall be made in accordance with the prescribed procedures, at the rates provided. The forms and relevant fees are dealt with under paragraph hereunder.

### 1.1. Availability of this Manual:

This Manual is published on the Company website at [www.castproducts.co.za](http://www.castproducts.co.za) or alternatively, a copy can be requested from the Information Officer.

### 1.2. Availability of Guides to the PAIA and POPIA Acts:

Guides to the PAIA and POPIA Acts can be obtained, and queries directed to:

<b>The Information Regulator (South Africa)</b>
JD House
27 Stiemens Street
Braamfontein
Johannesburg
2001

<b>The Information Regulator (South Africa)</b>
P.O. Box 31533 Braamfontein Johannesburg 2017
Website: <a href="https://www.justice.gov.za/infoereg/index.html">https://www.justice.gov.za/infoereg/index.html</a>
General Enquiries E-mail: <a href="mailto:infoereg@justice.gov.za">infoereg@justice.gov.za</a>
Complaints E-mail: <a href="mailto:complaints.IR@justice.gov.za">complaints.IR@justice.gov.za</a>

## **2. Company's Contact Details**

Physical Address: Union Junction  
Black Reef Road  
Germiston  
1400

Telephone Number: 010 502 2000

E-mail: [info@castproducts.co.za](mailto:info@castproducts.co.za)

Website: [www.castproducts.co.za](http://www.castproducts.co.za)

Information Officer: Johan du Toit

E-mail: [johan@engagedbt.co.za](mailto:johan@engagedbt.co.za)

Deputy Information Officer: Tlangelani Dolly Makole

E-mail: [tmakole@castproducts.co.za](mailto:tmakole@castproducts.co.za)

E-mail address for any PAIA requests: [info@castproducts.co.za](mailto:info@castproducts.co.za)

## **3. Company Record in terms of PAIA:**

### 3.1. Company Records Classification Key:

<b>Classification No.</b>	<b>Access</b>	<b>Classification [PAIA section]</b>
1	May be Disclosed	Public Access Document
2	May not be Disclosed	Request after commencement of criminal or civil proceedings [Section 7]
3	May be Disclosed	Subject to copyright
4	Limited Disclosure	Personal Information of Natural Persons that belongs to the requestor of that information, or personal information of Juristic Persons represented by the requestor of that information [Section 61]
5	May not be Disclosed	Unreasonable disclosure of personal information of Natural Person [Section 63(1)] or Juristic Person [POPI]
6	May not be Disclosed	Likely to harm the commercial or financial interests of third party [Section 64(1)(a) and (b)]
7	May not be Disclosed	Likely to harm the Company or third party in contract or other negotiations [Section 64(1)(c)]
8	May not be Disclosed	Would breach a duty of confidence owed to a third party in terms of an Agreement [Section 65]
9	May not be Disclosed	Likely to compromise the safety of individuals or protection of property [Section 66]

### 3.2. Company Records Availability:

<b>Departmental Records</b>	<b>Subject</b>	<b>Classification No.</b>
Communications / Public Affairs Department	Current Product Information	1, 4
	Public Corporate Records	1
	Launches and Events Records	4, 5
	Journalist Records	4, 5
	Media Releases	1
Health, Safety and Environmental Department	Environmental Policy	1
	Environmental Records	11, 14
	Health and Safety Records (Employees, Contractors)	4, 5, 9
Human Resources Division	Employee Records / Information	4, 5, 9 / 10
	Employment Contracts	4, 5
	Personnel Guidelines, Policies and Procedures	12
	Employee Medical Records	4, 5, 8
	Employee Disability Insurance Records	4, 5
	Employee Pension and Provident Fund Records	4, 5
	Payroll Records	4, 5
	Recruitment Records	4, 5
	In- and-Ex-patriates' Records	4, 5
Financial Division	Audited Financial Statements	12

	Tax Records (Company & Employees)	4, 12
	Asset Register	12
	Supplier Records / Information	4, 5 / 10
	Management Accounts	12
Legal Services	General Contract Documentation	6, 12
	Intellectual Property Records	3
	Immovable Property Records	12
	Statutory Records	12
Compliance	Company Guidelines, Policies and Procedures	12
Sales and Marketing Division	Market Information	12, 13
	Product Brochures	1
	Field Records	4, 12
Business Relations – Sub-Saharan Africa	Product Sales Records	1
	Marketing and Future Product Strategies	12
	Customer Information and Database	4, 5, 12
	Agency Agreements and Documents	4, 5, 6, 7, 12, 13
Production / Logistics Division	Production Records	12
	Engineering Records	12,13
	Quality Records	12
Customer Interaction Centre	Customer Records	4, 5
IT Department	Processing, Testing and Development Records	4, 5

Facilities Management Department	Physical Security Records (Visitors, Suppliers, Contractors, Employees)	4, 5
	Electronic Access & Identity Management Records (Employees, Contractors)	4, 5
	Time and Attendance Records	4, 5
Risk Control Centre	Complaints and Investigations Records	4, 5
Mail Room	Mail Register	4, 5

#### 4. Processing of Personal Information

The Company takes the privacy and protection of personal information very seriously and will only process personal information in accordance with the current South African privacy protection laws. Accordingly, the relevant personal information privacy principles relating to the processing thereof (including, but not limited to, the collection, handling, transfer, sharing, correction, storage, archiving and deletion) will be applied to any personal information processed by the Company.

##### 4.1. The purpose of processing of personal information by the Company:

We process personal information for a variety of purposes, including but not limited to the following:

- to provide or manage any information, products and/or services requested by data subjects;
- to help us identify data subjects when they contact the Company;
- to maintain customer records;
- for recruitment purposes;
- for employment purposes;
- for apprenticeship purposes;
- for travel purposes;
- for general administration, financial and tax purposes;
- for legal or contractual purposes;
- for health and safety purposes;
- to monitor access, secure and manage our premises and facilities;
- to help us improve the quality of our products and services;
- to help us detect and prevent fraud and money laundering;
- to help us recover debts;
- to carry out analysis and customer profiling; and
- to identify other products and services which might be of interest to data subjects and to inform them about our products and services.

**4.2. Category of data subjects and personal information processed by the Company:**

<b>Categories of Data Subjects</b>	<b>Personal Information processed</b>
Customers and Potential Customers	Personal information
Suppliers	Personal information
	Personal information of representatives
Employees	Personal information
	Medical information
	Disability information
	Pension and Provident Fund Information
	Contracts
	Performance records
	Payroll records
	Electronic access records
	Physical access records
	Surveillance records
	Health and safety records
	Training records
	Employment history
	Time and attendance records
Job Applicants	Curriculum Vitae and application forms
	Criminal checks
	Background checks
Children	Personal information processed for pre-school
	Medical information
	Information acquired for processing travel documents
Visitors	Physical access records
	Electronic access records and scans
	Surveillance records
In-Patriates and Ex-Patriates	Personal information
	Children's personal information



#### **4.3. Recipients or categories of recipients with whom personal information is shared:**

We may share the personal information of our data subjects for any of the purposes outlined in paragraph 4.1 above, with the following:

- our other Group Companies in South Africa and in other countries;
- our carefully selected business partners who provide products and services under one of our brands; and
- our service providers and agents who perform services on our behalf.

We do not share the personal information of our data subjects with any third parties, except if:

- we are obliged to provide such information for legal or regulatory purposes;
- we are required to do so for purposes of existing or future legal proceedings,
- we are selling one or more of our businesses to someone to whom we may transfer our rights under any customer agreement we have with you;
- we are involved in the prevention of fraud, loss, bribery or corruption;
- they perform services and process personal information on our behalf;
- this is required to provide or manage any information, products and/or services to data subjects; or
- needed to help us improve the quality of our products and services.

We will send our data subjects notifications or communications if we are obliged by law, or in terms of our contractual relationship with them.

We will only disclose personal information to government authorities if we are required to do so by law.

Our employees and our suppliers are required to adhere to data privacy and confidentiality principles and to attend data privacy training.

#### **4.4. Information security measures to protect personal information:**

Reasonable technical and organisational measures have been implemented for the protection of personal information processed by the Company and its operators. In terms of POPIA, operators are third parties that process personal information on behalf of the Company.

We continuously implement and monitor technical and organisational security measures to protect the personal information we hold, against unauthorised access, as well as accidental or willful manipulation, loss or destruction.

We will take steps to ensure that operators that process personal information on behalf of the Company apply adequate safeguards as outlined above.

#### **4.5. Personal information received from third parties:**

When we receive personal information from a third party on behalf of a data subject, we require confirmation that they have written consent from the data subject that they are aware of the contents of this Manual and the Company's Privacy Statement, and do not have any objection to our processing their information in accordance with this Manual.

### **5. Prescribed Request Forms and Fees:**

#### **5.1. Form of Request:**

**5.1.1.** To facilitate the processing of your PAIA access request, kindly:

- 5.1.1.1. Use the Prescribed PAIA Form attached hereto.
- 5.1.1.2. Address your request to the Information Officer.
- 5.1.1.3. Provide sufficient detail to enable the Company to identify:
  - 5.1.1.3.1. The record(s) requested.
  - 5.1.1.3.2. The requestor (and, if an agent is lodging the request, proof of capacity).
  - 5.1.1.3.3. The South African postal address, e-mail address or fax number of the requestor.
  - 5.1.1.3.4. The form of access required.
  - 5.1.1.3.5. If the requestor wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof.
  - 5.1.1.3.6. The right which the requestor is seeking to exercise or protect with an explanation of the reason, the record is required to exercise or protect the right.

**5.1.2.** To facilitate the processing of your POPIA objection, correction or delegation request, kindly:

- 5.1.2.1. Upon receipt of the requested information, the following actions may be taken:
  - 5.1.2.1.1. No further action necessary;
  - 5.1.2.1.2. Object to the processing of your personal information; or
  - 5.1.2.1.3. Request for the correction or deletion of your personal information.
- 5.1.2.2. Once a decision has been made, use the relevant Prescribed POPIA Form (Form 1 or Form 2) attached hereto.
- 5.1.2.3. Address your request to the Information Officer.

#### **5.2. Prescribed fees in terms of PAIA:**

- 5.2.1. A requestor is required to pay the prescribed fees (R50.00) before a request will be processed.
- 5.2.2. If the preparation of the record requested requires more than the prescribed hours (six), a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted).
- 5.2.3. A requestor may lodge an application with a court against the tender / payment of the request fee and/or deposit.
- 5.2.4. Records may be withheld until the fees have been paid.
- 5.2.5. The detailed Fee Structure is attached hereto.

#### **5.3. Access to required PAIA and POPIA Forms and the Prescribed Fees:**

5.3.1. The prescribed forms and fees are attached hereto and are published on the Company website or, alternatively, copies can be requested from the Information Officer. The Prescribed Forms and Fees can be found on the Company website at [www.castproducts.co.za](http://www.castproducts.co.za).

**6. Remedies:**

**6.1.** The Company does not have internal appeal procedures regarding the PAIA and POPIA Act requests. As such, the decision made by the duly authorised persons is final. If a request is denied, the requestor is entitled to apply to a court with appropriate jurisdiction, or the Information Regulator (South Africa), for relief.

**PRESCRIBED FEES**

The following applies to requests (other than personal requests):

- 1.1 A requestor is required to pay the prescribed fees (R50.00) before a request will be processed;
- 1.2 If the preparation of the record requested requires more than the prescribed hours (six), a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted);
- 1.3 A requestor may lodge an application with a court against the tender/payment of the request fee and/or deposit;
- 1.4 Records may be withheld until the fees have been paid.
- 1.5 Payments should be made to CAST Products South Africa (Pty) Ltd.

**Fees in respect of private bodies.**

1. The fee for a copy of the manual as contemplated in regulation 9(2)(c) is R1.10 for every photocopy of an A4-size page or part thereof.
2. The fees for reproduction referred to in regulation 11(1) are as follows:

	R
(a) For every photocopy of an A4-size page or part thereof	1.10
(b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	0.75
(c) For a copy in a computer-readable form on -	
(i) stiffy disc	7.50
(ii) compact disc	70.00
(d) (i) For a transcription of visual images, for an A4-size page or part thereof	40.00
(ii) For a copy of visual images	60.00
(e) (i) For a transcription of an audio record, for an A4-size page or part thereof	20.00
(ii) For a copy of an audio record	30.00
3. The request fee payable by a requestor, other than a personal requestor, referred to in regulation 11(2) is R50.00.

**PAIA 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

(Address): \_\_\_\_\_

E-mail address: \_\_\_\_\_

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:		Facsimile:
	Cellular:		
Full names of person on whose behalf request is made <i>(if applicable):</i>			



# CAST PRODUCTS

SOUTH AFRICA

Identity Number	
Postal Address	

Street Address	
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E-mail Address	
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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	
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Any further particulars of record	

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

Record is in written or printed form	
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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	

**FORM OF ACCESS**  
(Mark the applicable box with an "X")

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	

**MANNER OF ACCESS**  
(Mark the applicable box with an "X")

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> )	



**CAST PRODUCTS**  
SOUTH AFRICA

**PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED**

*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.*

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

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

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

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**FOR OFFICIAL USE**

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

**Signature of Information Officer**

**POPIA FORM 1  
OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION**

(Section 11(3) of the Protection of Personal Information Act, 2013 (Act No. 4 of 2013))

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018**  
[Regulation 2]

*Note:*

- 1. Affidavits or other documentary evidence as applicable in support of the objection may 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.*
- 3. Complete as is applicable.*

**A. DETAILS OF DATA SUBJECT**

Name(s) and surname / registered name of data subject:

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Identity Number: \_\_\_\_\_

Residential, postal or business address:

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Code: \_\_\_\_\_

Contact number(s): \_\_\_\_\_

E-mail address: \_\_\_\_\_

**B. DETAILS OF RESPONSIBLE PARTY**

Name(s) and surname / registered name of responsible party:

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Identity Number: \_\_\_\_\_

Residential, postal or business address:

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Code: \_\_\_\_\_

Contact number(s): \_\_\_\_\_

E-mail address: \_\_\_\_\_

**C. REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f)**

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Signed at \_\_\_\_this \_\_\_\_day of \_20 \_\_\_\_

\_\_\_\_\_  
Signature of data subject / designated person

**FORM 2**  
**REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR**  
**DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION**  
(Section 24(1) of the Protection of Personal Information Act, 2013  
(Act No. 4 of 2013))

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018**  
[Regulation 3]

*Note:*

- 1. Affidavits or other documentary evidence as applicable in support of the objection may 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.*
- 3. Complete as is applicable.*

Mark the appropriate box with an "x".

**REQUEST FOR:**

1. Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.

2. 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.

**A. DETAILS OF DATA SUBJECT**

Name(s) and surname / registered name: \_\_\_\_\_

\_\_\_\_\_

Identity Number / Unique Identifier: \_\_\_\_\_

Postal address: \_\_\_\_\_

\_\_\_\_\_

Contact details: \_\_\_\_\_

E-mail address: \_\_\_\_\_



**B. DETAILS OF RESPONSIBLE PARTY**

Registered name of responsible party/ies:

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Unique Identifier:

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**C. INFORMATION TO BE CORRECTED / DELETED / DESTROYED / DESTROYED**

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**D. PLEASE PROVIDE DEATILED REASONS FOR REQUEST IN TERMS OF:**

- i) CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(A) WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY; OR
- ii) DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(B) WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORISED TO RETAIN.

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

\_\_\_\_\_

\_\_\_\_\_

Signature of data subject / designated person