

# **Section 51**

# **Information Manual**

**Pilot Telematics (Pty) Ltd**

---

**("The Company")**

Prepared in accordance with Section 51 of the Promotion of  
Access to Information Act, No. 2 of 2000

Last Updated: 28 April 2025

---

## Index

|                                                      |    |
|------------------------------------------------------|----|
| 1. Introduction .....                                | 3  |
| 2. Availability of the Manual.....                   | 3  |
| 3. Core Business.....                                | 3  |
| 4. Contact Details.....                              | 3  |
| 5. Guide for Requestors on how to use the Act .....  | 4  |
| 6. Records freely available to the Public .....      | 4  |
| 7. Records Held in Accordance with Legislation.....  | 4  |
| 8. Client Records .....                              | 6  |
| 9. Corporate Governance and Company Secretarial..... | 6  |
| 10. Finance and Administration.....                  | 7  |
| 11. Human Resources .....                            | 7  |
| 12. Information Management .....                     | 8  |
| 13. Training .....                                   | 8  |
| 14. Media .....                                      | 8  |
| 15. Marketing and Communication.....                 | 8  |
| 16. Operations .....                                 | 8  |
| 17. Access Request Procedure.....                    | 10 |
| 18. Fees .....                                       | 12 |

## 1. Introduction

On 9 March 2001, the Promotion of Access to Information Act, No. 2 of 2000 ("**the Act**") came into operation, giving effect to the section 32(2) Constitutional right of access to information. In terms of Section 51(1) of the Promotion of Access to Information Act, all heads of private bodies are required to compile a manual that provides information regarding the subjects and categories of records held by such private bodies. This document serves as the Company's information manual and provides reference to the records held by the Company and the process to request access to such records.

## 2. Availability of the Manual

A copy of this manual is available to the public for inspection on the Company's website at [www.pilot-telematics.co.za](http://www.pilot-telematics.co.za) or on request from the designated contact person referred to in this manual. This manual is also available for inspection at the the SAHRC.

## 3. Core Business

The Company's core business is: Hosting services on an IoT Software Platform. Vehicle Telemetry Specialists

## 4. Contact Details

The responsibility for administration of and compliance with the Act, has been delegated by the Company to the Information Officer. Requests pursuant to the provisions of the Act should be directed as follows:

|                  |                                                                              |
|------------------|------------------------------------------------------------------------------|
| Contact Person   | Mr. Kubashen Rajoo                                                           |
| Postal Address   | Unit 1, Tierkloof Centre, 2 Coral Road<br>Bettys Bay, Western Cape, 7141     |
| Physical Address | Unit 1, Tierkloof Centre, 2 Coral Road<br>Bettys Bay, Western Cape, 7141     |
| Phone Number     | 0824589369                                                                   |
| Email            | <a href="mailto:info@pilot-telematics.co.za">info@pilot-telematics.co.za</a> |

## **5. Guide for Requestors on how to use the Act**

The Act grants a requester access to records of a private body, if the record 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 in terms of the Act must be made in accordance with the prescribed procedures, at the rates provided. The forms and tariff are dealt with in paragraphs 6 and 7 of the Act.

A Guide has been compiled in terms of Section 10 of the Act by the Human Rights Commission. It contains information to assist a person wishing to exercise a constitutional right, in terms of the Act. The Guide is available from the SAHRC as follows:

The South African Human Rights Commission: PAIA Unit

Physical Address: 29 Princess of Wales Terrace  
corner York and St. Andrews Streets  
Parktown

Postal address: Private Bag 2700  
Houghton  
2041

Telephone number: +27 (11) 877 3600

Fax number: +27 (11) 403 0625

E-mail: PAIA@sahrc.org.za

## **6. Records freely available to the Public**

The categories of records that are available without a person having to request access in terms of the Act are:

- Certain marketing information, adverts and brochures
- Certain product information
- External media releases
- Public company records

## **7. Records Held in Accordance with Legislation**

The Company holds records in accordance with the following legislation

- Basic Conditions of Employment Act, No. 75 of 1997
- Broad Based Black Economic Empowerment Act, No. 53 of 2003

- Companies Act, No. 71 of 2008
- Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993
- Constitution of South Africa Act, No. 108 of 1996
- Copyright Act, No. 98 of 1987
- Deeds Registries Act, No. 47 of 1937
- Electronic Communications and Transactions Act, No. 2 of 2000
- Employment Equity Act, No. 55 of 1998
- Environment Conservation Act, No. 73 of 1989
- Firearms Control Act, No. 60 of 2000
- Financial Advisory and Intermediary Services Act, No. 37 of 2002
- Financial Intelligence Centre Act, No. 38 of 2001
- Income Tax Act, No. 58 of 1962
- Labour Relations Act, No. 66 of 1995
- Long Term Insurance Act, No. 52 of 1998
- National Road Traffic Act, No. 93 of 1996
- 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
- Protected Disclosures Act, No. 26 of 2000
- Protection of Personal Information Act, No 4 of 2013
- Regulation of Interception of Communications and Provisions of Communication Related Information Act, No. 70 of 2002
- Skills Development Act, No. 97 of 1997
- Skills Development Levy Act, No. 9 of 1999
- Short Term Insurance Act, No. 53 of 1998
- Tobacco Products Control Act, No. 12 of 1999
- Trade Marks Act, No. 194 of 1993
- Transfer Duty Act, No. 40 of 1949
- Unemployment Insurance Act, No. 63 of 2001
- Value-added Tax Act, No. 89 of 1991

Please note that while we have made every effort to identify all pertinent legislation, we cannot guarantee that all legislation has been included. Any omission is unintended.

## **8. Client Records**

The Company holds the following categories of records in respect of clients:

- Financial Information
- Correspondence
- Fee Files
- Contracts
- Reports
- Business Information
- Findings and Recommendation reports
- Investigative Material
- Legal Documentation
- Proposal and Tender Documents
- Project Plans
- Risk Management Records
- Solution Methodologies
- Working Papers

## **9. Corporate Governance and Company Secretarial**

The Company holds the following categories of records in respect of corporate governance and company secretarial:

- Applicable statutory documents such as but not limited to certificates of incorporation and certificates to commence business
- Annual Reports
- Codes of Conduct
- Corporate Social Investment Records
- Corporate Structure Diagrams
- Governing Board Meeting Minutes
- Executive Committee Meeting Minutes
- Risk Management Records
- Legal and Compliance Records
- Statutory Returns
- Policies

- Memorandum of Incorporation
- Share Registers
- Share Certificates
- Shareholder Agreements
- Minutes of Meetings

## **10. Finance and Administration**

The Company holds the following categories of records in respect of finance and administration:

- Accounting Records
- Annual Financial Statements
- Agreements
- Banking Records
- Correspondence
- Invoices and Statements
- Management Reports
- Tax Records and Returns

## **11. Human Resources**

The Company holds the following categories of records in respect of human resources:

- Accounting and Payroll Records
- BEE Statistics
- Career Development Records
- Personnel Information
- Employment Equity Reports
- General Terms of Employment
- Letters of Employment
- Leave Records
- PAYE Records and Returns
- Performance Management Records
- Policies and Procedures
- UIF returns
- Retirement Benefit and Medical Aid

**12. Information Management**

The Company holds the following categories of records in respect of information management:

- Contracts and Agreements
- Equipment Register
- Information Policies, Standards, Procedures and Guidelines

**13. Training**

The Company holds the following categories of records in respect of training:

- Training Materials
- Training Records and Statistics
- Training Agreements

**14. Media**

The Company holds the following categories of records in respect of media:

- External Publications
- Internal Publications
- Reference Works
- Periodicals
- Research Files (Articles)

**15. Marketing and Communication**

The Company holds the following categories of records in respect of marketing and communications:

- Proposal Documents
- New Business Development
- Brand Information Management
- Marketing Strategies
- Communication Strategies
- Agreements
- Client Relationship Programmes
- Marketing Brochures

**16. Operations**

The Company holds the following categories of records in respect of operations:

- Access Control Records
- Agreements
- Archival Administration Documentation
- Communication Strategies
- Contracts
- General Correspondence
- Patents and Trade Mark Documents
- Insurance Documentation
- Service level agreements
- Travel Documentation
- Vehicle Registration Documents

## 17. Access Request Procedure

**Please note that the successful completion and submission of an access request form does not automatically allow the requester access to the requested record. An application for access to a record is subject to certain limitations if the requested record falls within certain categories as specified in the Act. If it is suspected that the requester has obtained access to records through the submission of materially false or misleading information, legal proceedings may be instituted against the requester.**

### *Completion of the Access Request Form*

In order to facilitate a timely response to requests for access, all requesters should take note of the following when completing the Access Request Form:

- An Access Request Form must be completed. This form must be in the prescribed format as defined in Form C of Annexure B as identified in Government Notice Number 187, Regulation 6. A copy of the request form is attached.
- Proof of identity is required to authenticate the identity of the requester. Therefore, in addition to the access form, requestors will be required to supply a copy of their identification document.
- Type or print in BLOCK LETTERS an answer to every question.
- If a question does not apply, state “N/A” in response to that question.
- If there is nothing to disclose in reply to a particular question state “nil” in response to that question.
- If there is insufficient space on a printed form, additional information may be provided on an additional attached page.

Please note:

- In terms of the Act, the requester is required to provide sufficient detail on the request form to enable the Company to identify the record and the requester. The requester should also indicate the format access is required in, and if 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 to be 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 Company.

- An application for access to information can be refused if the application does not comply with the procedural requirements of the Act.
- The successful completion and submission of an access request form does not automatically allow the requestor access to the requested record.
- If the request is for access to a record that contains information about a third party, the Company is obliged to contact the third party to inform them of the request and to give them an opportunity to respond by either consenting to the access or by providing reasons why the access should be denied. In the event that the third party furnishes reasons for the support or denial of access, the Company will consider these reasons in determining whether access may be granted.

#### *Submission of the Access Request Form*

- The completed Access Request Form together with a copy of the identity document must be submitted either via the mail, e-mail or fax and must be addressed to the contact person as indicated above.
- An initial request fee of R50.00 is payable on submission.
- This fee is not applicable to Personal Requesters, referring to any person seeking access to records that contain their personal information.

#### *Payment of Fees*

- Payment details can be obtained from the contact person as indicated above and can be made by EFT (no credit card payments are accepted). Proof of payment must be supplied.
- The access fee must be paid prior to access being given to the requested record.
- If the request for access is successful an access fee may be required for the search, reproduction and/or preparation of the record/s and will be calculated based on the Prescribed Fees.
- If a deposit has been paid in respect of a request for access, which is refused, then the information officer concerned must repay the deposit to the requester

#### *Notification*

- The Company will, within 30 days of receipt of the request, decide whether to grant or decline the request and give notice with reasons (if required) to that effect.
- The 30-day period within which the Company has to decide whether to grant or refuse the request, may be extended for a further period of not more than thirty days, if the request is for a large volume of information, or the request requires a search for information held at another office of the Company

and the information cannot reasonably be obtained within the original 30-day period. The Company will notify the requester in writing should an extension be sought.

#### *Grounds for Refusal of Access to Records*

The main grounds for refusal of a request for information are:

- Mandatory protection of the privacy of a third party who is a natural person, which would involve the unreasonable disclosure of personal information of that natural person.
- Mandatory protection of the commercial information of a third party, if the record contains:
  - o Trade secrets of that party.
  - o Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that party.
  - o Information disclosed in confidence by a third party to the Company if the disclosure could put that third party to a disadvantage in negotiations or commercial competition.
- Mandatory protection of confidential information of third parties if it is protected in terms of any agreement.
- Mandatory protection of the safety of individuals and the protection of property.
- Mandatory protection of records which could be regarded as privileged in legal proceedings.
- The commercial activities of the Company which may include:
  - o Trade secrets of the Company.
  - o Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of the Company.

Note that the requester may lodge an application with the court against the Company's rejection of an application. For details on the procedure, please refer to Chapter 2 of Part 4 of the Act.

If the request of access is granted, the requester will be able to gain access to the requested records as soon as is reasonably possible but only after the access fees have been paid.

## **18. 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.

If the request is granted then further fees are payable for the search, reproduction, preparation and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure.

#### *Schedule of Fees*

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:

|     |                                                                                                                         |        |
|-----|-------------------------------------------------------------------------------------------------------------------------|--------|
| (a) | For every photocopy of an A4-size page or part thereof                                                                  | R1,10  |
| (b) | For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine- readable form | R0,75  |
| (c) | For a copy in a computer-readable form on compact disc                                                                  | R70,00 |
| (d) | (i) For a transcription of visual images, for an A4-size page or part thereof                                           | R40,00 |
|     | (ii) For a copy of visual images                                                                                        | R60,00 |
| (e) | (i) For a transcription of an audio record, for an A4-size page or part thereof                                         | R20,00 |
|     | (ii) For a copy of an audio record                                                                                      | R30,00 |

3. The request fee payable by a requester, other than a personal requester, referred to in regulation 11(2) is R50,00.

4. The access fees payable by a requester referred to in regulation 11(3) are as follows:

|        |                                                                                                                         |        |
|--------|-------------------------------------------------------------------------------------------------------------------------|--------|
| (1)(a) | For every photocopy of an A4-size page or part thereof                                                                  | R1,10  |
| (b)    | For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine- readable form | R0,75  |
| (c)    | For a copy in a computer-readable form on compact disc                                                                  | R70,00 |
| (d)    | (i) For a transcription of visual images, for an A4-size                                                                | R40,00 |
|        | (ii) For a copy of visual images                                                                                        | R60,00 |
| (e)    | (i) For a transcription of an audio record, for an A4-size page or part thereof                                         | R20,00 |
|        | (ii) For a copy of an audio record                                                                                      | R30,00 |

- (f) To search for and prepare the record for disclosure, R30,00 for each hour or part of an hour reasonably required for such search and preparation.
- 5. The actual postage is payable when a copy of a record must be posted to a requester.

REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

Section 53(1) of the Promotion of Access to Information Act, 2000

A. Particulars of private body

The Head / Information Officer:

B. Particulars of person requesting access to the record

- (a) *The particulars of the person who requests access to the record must be given below.*
- (b) *The address and/or fax number in the Republic to which the information is to be sent must be given.*
- (c) *Proof of the capacity in which the request is made, if applicable, must be attached.*

Full names and surname:

Identity number:

Postal address:

Fax number:

Telephone number:

E-mail address:

Capacity in which request is made, when made on behalf of another person:

C. Particulars of person on whose behalf request is made

*This section must be completed ONLY if a request for information is made on behalf of another person.*

Full names and surname:

Identity number:

D. Particulars of record

- (a) *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.*
- (b) *If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.*

1. Description of record or relevant part of the record:

2. Reference number, if available:

3. Any further particulars of record:

E. Fees

- (a) *A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid.*
- (b) *You will be notified of the amount required to be paid as the request fee.*
- (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.*
- (d) *If you qualify for exemption of the payment of any fee, please state the reason for exemption.*

Reason for exemption from payment of fees:

F. Form of access to record

*If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the record is required.*

Disability:

Form in which record is required:

**NOTES:**

- (a) Compliance with your request in the specified form may depend on the form in which the record is available.
- (b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.
- (c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.

Mark the appropriate box with an X.

|                                                                                                                                                  |                                              |                          |                                                                 |     |    |
|--------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|--------------------------|-----------------------------------------------------------------|-----|----|
| 1. If the record is in written or printed form:                                                                                                  |                                              |                          |                                                                 |     |    |
| <input type="checkbox"/>                                                                                                                         | copy of record*                              | <input type="checkbox"/> | inspection of record                                            |     |    |
| 2. If record consists of visual images<br>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc.):      |                                              |                          |                                                                 |     |    |
| <input type="checkbox"/>                                                                                                                         | view the images                              | <input type="checkbox"/> | copy of the images*                                             |     |    |
| <input type="checkbox"/>                                                                                                                         |                                              | <input type="checkbox"/> | transcription of the images*                                    |     |    |
| 3. If record consists of recorded words or information which can be reproduced in sound:                                                         |                                              |                          |                                                                 |     |    |
| <input type="checkbox"/>                                                                                                                         | listen to the soundtrack<br>(audio cassette) | <input type="checkbox"/> | transcription of soundtrack*<br>(written or printed document)   |     |    |
| 4. If record is held on computer or in an electronic or machine-readable form:                                                                   |                                              |                          |                                                                 |     |    |
| <input type="checkbox"/>                                                                                                                         | printed copy of record*                      | <input type="checkbox"/> | printed copy of information derived from the record*            |     |    |
| <input type="checkbox"/>                                                                                                                         |                                              | <input type="checkbox"/> | copy in computer readable form*<br>(stiffy or compact disc)     |     |    |
| *If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you?<br>Postage is payable. |                                              |                          | <table border="1"> <tr> <td>YES</td> <td>NO</td> </tr> </table> | YES | NO |
| YES                                                                                                                                              | NO                                           |                          |                                                                 |     |    |

G. Particulars of right to be exercised or protected

*If the provided space is inadequate, please continue on a separate folio and attach it to this form.  
The requester must sign all the additional folios.*

1. Indicate which right is to be exercised or protected:
2. Explain why the record requested is required for the exercise or protection of the aforementioned right:

H. Notice of decision regarding request for access

*You will be notified in writing whether your request has been approved/denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.*

How would you prefer to be informed of the decision regarding your request for access to the record?

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

SIGNATURE OF REQUESTER / PERSON  
ON WHOSE BEHALF REQUEST IS MADE