

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

## LIST OF ACRONYMS AND ABBREVIATIONS

- “**CEO**” Chief Executive Officer
- “**DIO**” Deputy Information Officer;
- “**IO**” Information Officer;
- “**Minister**” Minister of Justice and Correctional Services;
- “**PAIA**” Promotion of Access to Information Act No. 2 of 2000( as Amended);
- “**POPIA**” Protection of Personal Information Act No.4 of 2013;
- “**Regulator**” Information Regulator; and
- “**Republic**” Republic of South Africa

## 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;

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- 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 STC LOGISTICS (PTY) LTD.

#### 3.1. Information Officer

Name: Jan Roux  
Tel: 011 402 5715  
Email: [jan@tranzaction.co.za](mailto:jan@tranzaction.co.za)  
Mobile: 082 418 6095

#### 3.2. Deputy Information Officer

Name: Kobus Theron  
Tel: 011 402 5715  
Email: [kobus@stclogistics.co.za](mailto:kobus@stclogistics.co.za)  
Mobile: 066 203 3317

#### 3.3 Admin Officer & ISO Systems Leader

Name: Angeluque Steyn  
Tel: 011 402 5715  
Email: [angie@stclogistics.co.za](mailto:angie@stclogistics.co.za)  
Mobile: 081 2330 4644

#### 3.4 Access to information general contacts

Operations Director (Sydney Magoro): [sydney@stclogistics.co.za](mailto:sydney@stclogistics.co.za)

Commercial Manager (Angie Steyn): [angie@stclogistics.co.za](mailto:angie@stclogistics.co.za)

Operations Manager (Keagan Pillay): [keagan@stclogistics.co.za](mailto:keagan@stclogistics.co.za)

#### 3.5 National or Head Office

Postal Address: P.O.Box 2749, Edenvale, 1610

Physical Address: 276 Maple Street, Pomona, Kempton Park, 1619

Telephone: 011 402 5715

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

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

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**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 English.
- 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 PAIA<sup>1</sup> and section 56 of POPIA<sup>2</sup>;
  - 4.3.3. the manner and form of a request for-
    - 4.3.3.1. access to a record of a public body contemplated in section 11<sup>3</sup>; and
    - 4.3.3.2. access to a record of a private body contemplated in section 50<sup>4</sup>;
  - 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 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;
  - 4.3.8. 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;
  - 4.3.9. 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
  - 4.3.10. the regulations made in terms of section 92<sup>11</sup>.
- 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.

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- 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/infogov/>).
- 4.6 A copy of the Guide is also available for public inspection during normal office hours.

- 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.
- 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
- 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.”

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**5. CATEGORIES OF RECORDS OF STC LOGISTICS (PTY) LTD, WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS**

These are records held by STC Logistics (Pty) Ltd, which are available without a person having to request access by completing Form C.

Category of records	Types of the Record	Available on Website	Available upon request
Company Profile	General Information	X	X
Services Offered	General Information	X	X
BBBEE Certificate	Regulatory & Compliance		X
Tax Clearance	Regulatory & Compliance		X
Credit Application	Regulatory & Compliance		X
PAIA Manual	Regulatory & Compliance		X
Privacy Policy (POPIA)	Regulatory & Compliance		X
Terms and Conditions	Regulatory & Compliance		X
Credit Application	Ops & Customer Forms		X

**6. DESCRIPTION OF THE RECORDS OF STC LOGISTICS (PTY) LTD, WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION**

STC Logistics (Pty) Ltd maintains records in accordance with applicable South African legislation governing its operations as a supply chain management, logistics and courier service provider. The categories of records and the applicable legislation are set out below:

Category of Records	Applicable Legislation
Memorandum of incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Memorandum of Incorporation	Companies Act 71 of 2008
Company Records	Companies Act 71 of 2008
Financial & Accounting Records	Companies Act 71 of 2008
Tax Records	Income Tax Act 58 of 1962; Value-Added Tax Act 89 of 1991
Employment Records	Basic Conditions of Employment Act 75 of 1997
Labour Relations Records	Labour Relations Act 66 of 1995
Employment Equity Records	Employment Equity Act 55 of 1998
Health and Safety Records	Occupational Health and Safety Act 85 of 1993
Customer & Commercial Records	Consumer Protection Act 68 of 2008
Records of Personal Information	Protection of Personal Information Act 4 of 2013

**7. DESCRIPTION OF THE SUBJECTS ON WHICH STC LOGISTICS (PTY) LTD, HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT**

STC Logistics (Pty) Ltd maintains records across various functional areas necessary for the conduct of its business operations and compliance with applicable legislation. The subjects and general categories of records held are outlined below.

Subjects on which the body holds records	Categories of records
Strategic and Executive Management	Strategic and administrative records
Finance	Financial and accounting records
Human Resources	Personnel and employment records
Operations	Operational records relating to service delivery
Fleet Management	Transport and vehicle-related records
Commercial	Customer and commercial records
Information Technology	Systems and data records
Compliance & Legal	Compliance, legal and regulatory records

## 8. PROCESSING OF PERSONAL INFORMATION

8.1 STC Logistics (Pty) Ltd processes personal information for the following purposes:

- 8.1.1 To provide courier, distribution, and dedicated fleet services to clients
- 8.1.2 To collect, transport, and deliver shipments, including capturing sender and recipient details
- 8.1.3 To create, manage, and track waybills and Proof of Delivery (PODs)
- 8.1.4 To communicate with clients, suppliers, and recipients regarding collections, deliveries, and service-related matters
- 8.1.5 To administer client accounts, including billing, invoicing, and debt collection
- 8.1.6 To procure goods and services from suppliers and manage supplier relationships
- 8.1.7 To manage employees and contractors, including payroll, HR administration, performance management, and compliance
- 8.1.8 To comply with legal and regulatory requirements, including tax, labour, and transport legislation
- 8.1.9 To maintain safety, security, and operational control, including vehicle tracking and access control
- 8.1.10 To manage claims, insurance matters, and incident investigations
- 8.1.11 To support internal reporting, performance analysis, and operational improvement

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 / Clients	Company names, contact persons, ID numbers (where applicable), registration numbers, addresses, contact details, billing information, banking details

Recipients / Consignees	Names, delivery addresses, contact numbers, email addresses, Proof of Delivery signatures, location data
Suppliers / Service Providers	Company details, contact persons, registration numbers, VAT numbers, addresses, banking details, contracts
Employees	Names, ID numbers, contact details, addresses, qualifications, employment history, payroll information, banking details, medical information (where required), disciplinary records
Job Applicants	Names, contact details, CVs, qualifications, employment history, references
Visitors to Premises	Names, ID/passport numbers, contact details, access logs, CCTV footage (where applicable)

8.3 The recipients or categories of recipients to whom the personal information may be supplied. STC Logistics (Pty) Ltd will only share personal information with authorised recipients where required for operational, contractual, or legal purposes, and will ensure that appropriate safeguards are in place to protect such information.

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Customer and consignee details (names, contact details, delivery addresses, waybill information)	Clients, consignees/recipients, and authorised representatives involved in the delivery process
Proof of Delivery (POD) information, including names and signatures	Clients (for verification of delivery), internal systems, and authorised auditors
Shipment and tracking data (including location data)	Clients, internal operations teams, and tracking service providers (e.g. vehicle tracking companies)
Billing and financial information (invoices, payment history, banking details)	Accounting service providers, auditors, banks, and payment processors
Credit application and credit history information	Credit bureaus and credit verification agencies
Employee personal information (HR, payroll, qualifications, medical where applicable)	Payroll providers, SARS, Department of Labour, medical aid providers, pension/provident funds
Driver and contractor information (ID, licence, PDP, contact details)	Clients (where required for site access), insurance companies, law enforcement authorities
Supplier information (company details, banking details, contracts)	Banks, auditors, accounting systems, and internal finance teams
Identity numbers and personal details (for verification or investigations)	South African Police Services, regulatory authorities, and verification agencies
Qualification and background information	Verification agencies (e.g. SAQA), background screening providers
IT system data (user access, system logs, communications)	IT service providers, system vendors (e.g. Parcel Perfect), cloud hosting providers
CCTV footage and access control records (where applicable)	Security companies, law enforcement authorities, and authorised internal personnel

8.4 Planned transborder flows of personal information

8.4.1 STC Logistics (Pty) Ltd may transfer and/or store personal information outside the Republic of South Africa where such information is processed or hosted by third-party service providers.

8.4.2 These may include Cloud hosting and software service providers, including but not limited to:

8.4.2.1 Parcel management and logistics systems (e.g. Parcel Perfect, VSC, Streamline or related platforms)

8.4.2.2 Accounting and payroll systems (e.g. Sage, Pastel or related platforms)

8.4.2.3 Email and document management systems (e.g. Microsoft 365, Google Workspace, Dropbox or related platforms)

8.4.2.4 IT infrastructure and backup services, as well as biometric clocking systems

8.4.3 Personal information that may be transferred includes:

8.4.3.1 Customer and consignee details (names, contact details, delivery addresses)

8.4.3.2 Shipment and tracking information

8.4.3.3 Proof of Delivery (POD) data (including names and signatures)

8.4.3.4 Employee and contractor information (HR and payroll data)

8.4.3.5 Supplier and financial information

8.4.4 Such information may be stored or processed in jurisdictions including, but not limited to:

8.4.4.1 South Africa

8.4.4.2 European Union (EU)

8.4.4.3 United States of America

8.4.5 STC Logistics (Pty) Ltd will ensure that any transborder transfer of personal information is subject to appropriate safeguards in accordance with POPIA, including that the recipient is subject to laws, binding corporate rules, or agreements that provide an adequate level of protection.

8.5 General Description of Information Security Measures

8.5.1 STC Logistics (Pty) Ltd implements appropriate, reasonable technical and organisational measures to ensure the confidentiality, integrity, and availability of personal information under its control.

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8.5.2 These measures include, but are not limited to, the following:

8.5.2.1 Access Control:

- 8.5.2.1.1 Access to systems is restricted to authorised users only
- 8.5.2.1.2 User access is controlled through unique usernames and passwords
- 8.5.2.1.3 Access rights are allocated based on roles and responsibilities
- 8.5.2.1.4 Access is removed or updated when employees leave or change roles

8.5.2.2 Data Protection and System Security:

- 8.5.2.2.1 Use of secure systems and platforms for operational and financial processing
- 8.5.2.2.2 Implementation of password protection and authentication controls
- 8.5.2.2.3 Regular system updates and patches to protect against vulnerabilities
- 8.5.2.2.4 Where applicable, data encryption is used for sensitive information

8.5.2.3 Network and Device Security

- 8.5.2.3.1 Use of anti-virus and anti-malware software on company devices
- 8.5.2.3.2 Firewalls and network security controls to protect internal systems
- 8.5.2.3.3 Secure use of company laptops, mobile devices, and handheld scanning devices
- 8.5.2.3.4 Controls to prevent unauthorised access to company systems

8.5.2.4 Physical Security

- 8.5.2.4.1 Controlled access to offices and operational sites
- 8.5.2.4.2 Visitor access is monitored where applicable
- 8.5.2.4.3 Secure storage of physical documents containing personal information
- 8.5.2.4.5 CCTV and access control systems (where applicable)

#### 8.5.2.5 Operational Controls

- 8.5.2.5.1 Controlled handling of Proof of Delivery (PODs) and shipment data
- 8.5.2.5.2 Procedures in place to ensure accurate capturing and secure transmission of data
- 8.5.2.5.3 Limitation of data sharing to authorised persons and for legitimate business purposes only

#### 8.5.2.6 Third-Party and Service Provider Management

- 8.5.2.6.1 Personal information shared with third-party service providers (e.g. IT systems, tracking providers, auditors) is limited to what is necessary
- 8.5.2.6.2 Service providers are required to implement appropriate security safeguards
- 8.5.2.6.3 Agreements are in place where required to ensure compliance with POPIA

#### 8.5.2.7 Employee Awareness and Training

- 8.5.2.7.1 Employees are made aware of their responsibilities regarding the protection of personal information
- 8.5.2.7.2 Training and operational guidance are provided on:
  - 8.5.2.7.2.1 Data handling
  - 8.5.2.7.2.2 Confidentiality
  - 8.5.2.7.2.3 Information security practices

#### 8.5.2.8 Data Backup and Availability

- 8.5.2.8.1 Regular data backups are performed to ensure information is not lost
- 8.5.2.8.2 Systems are designed to ensure availability of information for operational continuity
- 8.5.2.8.3 Disaster recovery measures are in place where applicable

#### 8.5.2.9 Incident Management

- 8.2.5.9.1 Procedures are in place to identify, report, and manage data breaches or security incidents
- 8.2.5.9.2 Where required, affected parties and the Information Regulator will be notified in accordance with POPIA

- 8.5.3 STC Logistics (Pty) Ltd regularly reviews and updates its information security measures to ensure ongoing compliance with applicable data protection laws and to address emerging risks.

## 9. AVAILABILITY OF THE MANUAL

- 9.1 A copy of the Manual is available-

- 9.1.1 At the head office of STC Logistics (Pty) Ltd, for public inspection during normal business hours;

- 9.1.1.1 to any person upon request and upon the payment of a reasonable prescribed fee; and

- 9.1.1.2 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

- 10.1 The Information Officer of STC Logistics (Pty) Ltd will, on a regular basis, review and update this manual to ensure that it remains accurate and aligned with applicable legislation.

- 10.2 Issued by

- 10.2.1 Jan Roux  
**Information Officer**  
STC Logistics (Pty) Ltd

- 10.2.2 Deputy Information & Admin Officers

- 10.2.3.1 Kobus Theron  
**Deputy Information Officer**  
STC Logistics (Pty) Ltd

- 10.2.3.2 Angie Steyn  
**Admin Officer & ISO Systems Leader**  
STC Logistics (Pty) Ltd

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