

# PAIA Manual: Macrotec Engineering (Pty) Ltd

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| <b>Document Title</b>  | PAIA Manual: Macrotec Engineering (Pty) Ltd |
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| Role     | Name       | Date         |
|----------|------------|--------------|
| Author   | HB Haywood | 25 June 2026 |
| Approved | JJ Haywood | 25 June 2026 |

## Revision History

| Rev | Date         | Description | Author     |
|-----|--------------|-------------|------------|
| 00  | 25 June 2026 | First issue | HB Haywood |

|                                              |                                                                                 |
|----------------------------------------------|---------------------------------------------------------------------------------|
| <b>Prepared in terms of</b>                  | Section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended) |
| <b>CIPC Registration No</b>                  | 2021/578674/07                                                                  |
| <b>Information Regulator Registration No</b> | 2026-001084                                                                     |

## 1. Acronyms and Abbreviations

**Table 1: Acronyms and Abbreviations**

| Abbreviation | Definition                                    |
|--------------|-----------------------------------------------|
| BCEA         | Basic Conditions of Employment Act 75 of 1997 |
| CEO          | Chief Executive Officer                       |
| DIO          | Deputy Information Officer                    |

| Abbreviation | Definition                                                    |
|--------------|---------------------------------------------------------------|
| IO           | Information Officer                                           |
| Minister     | Minister of Justice and Correctional Services                 |
| NEM:AQA      | National Environmental Management: Air Quality Act 39 of 2004 |
| PAIA         | Promotion of Access to Information Act 2 of 2000 (as amended) |
| POPIA        | Protection of Personal Information Act 4 of 2013              |
| Regulator    | Information Regulator of South Africa                         |
| Republic     | Republic of South Africa                                      |

## 2. Purpose of This Manual

This manual is compiled in accordance with Section 51 of PAIA and serves to:

- 2.1. Inform the public of the categories of records held by Macrotec Engineering (Pty) Ltd ("Macrotec") that are available without submitting a formal PAIA request.
- 2.2. Provide a sufficient description of the subjects on which Macrotec holds records and the categories of records on each subject, to enable a person to make a request for access.
- 2.3. Describe the records available in accordance with other South African legislation.
- 2.4. Provide contact details for the Information Officer and Deputy Information Officer(s) who will assist the public with access to records.
- 2.5. Describe the guide published by the Information Regulator on how to use PAIA, and explain how to obtain access to it.
- 2.6. Describe the categories of data subjects whose personal information is processed, the types of personal information processed, the recipients to whom it may be supplied, planned transborder flows, and security measures in place.

## 3. Key Contact Details

### 3.1 Information Officer

**Table 2: Information Officer Details**

| Field            | Details                |
|------------------|------------------------|
| <b>Name</b>      | Hendrik Barend Haywood |
| <b>Title</b>     | Managing Director      |
| <b>Telephone</b> | +27 32 552 2676        |
| <b>Fax</b>       | Not applicable         |
| <b>Email</b>     | info@macrotec.co.za    |

| Field            | Details                                                             |
|------------------|---------------------------------------------------------------------|
| Physical address | Unit 3 Warne House, 7 Garlicke Drive, Ballito, KwaDukuza, KZN, 4420 |

### 3.2 Deputy Information Officer

No Deputy Information Officer has been designated at this time. Should a Deputy Information Officer be designated in future, their details will be recorded here and registered with the Information Regulator.

### 3.3 General Contact for Access to Information Requests

**Table 3: General Contact**

| Field | Details             |
|-------|---------------------|
| Email | info@macrotec.co.za |

### 3.4 Head Office

**Table 4: Head Office Details**

| Field            | Details                                                             |
|------------------|---------------------------------------------------------------------|
| Postal address   | Unit 3 Warne House, 7 Garlicke Drive, Ballito, KwaDukuza, KZN, 4420 |
| Physical address | Unit 3 Warne House, 7 Garlicke Drive, Ballito, KwaDukuza, KZN, 4420 |
| Telephone        | +27 32 552 2676                                                     |
| Email            | info@macrotec.co.za                                                 |
| Website          | macrotecengineering.com                                             |

## 4. Guide on How to Use PAIA

4.1. The Information Regulator has, in terms of Section 10(1) of PAIA, updated and made available a Guide on how to use PAIA (the "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 Guide contains descriptions of the objects of PAIA and POPIA; the contact details of Information Officers and Deputy Information Officers; the manner and form of a request for access to records of public and private bodies; the assistance available from the Information Regulator; and all remedies in law regarding acts or failures to act in respect of rights or duties conferred by PAIA and POPIA, including the manner of lodging an internal appeal, a complaint to the Regulator, and an application with a court.

4.4. The Guide can be obtained from the website of the Information Regulator at <https://inforegulator.org.za/>. Alternatively, a person may contact the Information Officer (details in Section 3) to request assistance in obtaining the Guide.

4.5. In terms of Regulation 2 of the Regulations to PAIA, a copy of the Guide is available in English and Afrikaans for public inspection at the head office of Macrotec during normal business hours. No fee is payable for inspection of the Guide.

## 5. Records Available Without a Formal Request

No notice has been published by Macrotec in terms of Section 52(2) of PAIA. However, in terms of Section 52(1) of PAIA, the head of a private body may, on a voluntary basis, make available categories of records without a person having to submit a formal request. Macrotec makes the following records available voluntarily:

**Table 5: Records Available Without a Formal Request**

| Category            | Types of Records                                                      | Available on Website | Available Upon Request |
|---------------------|-----------------------------------------------------------------------|----------------------|------------------------|
| Company information | Company registration details                                          | No                   | Yes                    |
| Product information | Product brochures, specification sheets, general technical literature | Yes                  | Yes                    |
| PAIA manual         | This manual                                                           | Yes                  | Yes                    |

## 6. Records Available in Accordance With Other Legislation

The following records are created and maintained in accordance with South African legislation. Access to these records is subject to the provisions of the relevant Act as well as PAIA.

**Table 6: Records Available in Accordance With Other Legislation**

| Category of Records                     | Applicable Legislation                                                                       |
|-----------------------------------------|----------------------------------------------------------------------------------------------|
| Company registration and annual returns | Companies Act 71 of 2008                                                                     |
| Memorandum of Incorporation             | Companies Act 71 of 2008                                                                     |
| PAIA manual                             | Promotion of Access to Information Act 2 of 2000                                             |
| Tax records (income tax, VAT, PAYE)     | Income Tax Act 58 of 1962; Value-Added Tax Act 89 of 1991; Tax Administration Act 28 of 2011 |
| Employment records and contracts        | Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995               |

| Category of Records                                 | Applicable Legislation                                                   |
|-----------------------------------------------------|--------------------------------------------------------------------------|
| Employment equity reports                           | Employment Equity Act 55 of 1998                                         |
| Skills development levy records                     | Skills Development Levies Act 9 of 1999                                  |
| Unemployment insurance records                      | Unemployment Insurance Act 63 of 2001                                    |
| Compensation for occupational injuries              | Compensation for Occupational Injuries and Diseases Act 130 of 1993      |
| Occupational health and safety records              | Occupational Health and Safety Act 85 of 1993                            |
| Environmental authorisations and compliance records | National Environmental Management Act 107 of 1998;<br>NEM:AQA 39 of 2004 |
| B-BBEE records                                      | Broad-Based Black Economic Empowerment Act 53 of 2003                    |
| Import/export permits and customs documentation     | Customs and Excise Act 91 of 1964                                        |
| Financial statements and accounting records         | Companies Act 71 of 2008                                                 |
| Personal information processing records             | Protection of Personal Information Act 4 of 2013                         |

## 7. Subjects and Categories of Records Held

Macrotec holds records on the following subjects. This is a description of the categories of records, not an exhaustive list of individual documents.

**Table 7: Subjects and Categories of Records Held**

| Subject                | Categories of Records                                                                                                                                                          |
|------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Corporate governance   | Memorandum of Incorporation, shareholder records, board minutes, company resolutions, annual returns                                                                           |
| Finance and accounting | Financial statements, management accounts, bank records, invoices, payment records, budgets, audit reports, tax returns, VAT records                                           |
| Human resources        | Employment contracts, payroll records, leave records, performance appraisals, disciplinary records, training records, recruitment records, employee personal information files |
| Health and safety      | SHE files, risk assessments, incident reports, safety audit records, method statements, PPE records, safety training records                                                   |

| Subject                      | Categories of Records                                                                                                                                                      |
|------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Engineering and design       | Design calculations, engineering drawings, project specifications, design reviews, engineering change notices, test reports, commissioning records, product specifications |
| Commercial and sales         | Quotations, proposals, tender submissions, client contracts, purchase orders, sales correspondence, distributor and agent agreements                                       |
| Procurement and supply chain | Supplier contracts, purchase orders, supplier evaluations, subcontractor agreements, import/export documentation                                                           |
| Projects                     | Project briefs, site condition reports, commissioning records, project correspondence, handover documentation                                                              |
| Quality management           | Quality management system documentation, procedures, work instructions, audit records, nonconformity reports, corrective action records                                    |
| Environmental compliance     | Atmospheric emission licences, emission monitoring records, waste management records, environmental impact assessments                                                     |
| Marketing and communications | Marketing materials, website content, brochures, product literature, case studies, press releases                                                                          |
| Information technology       | IT policies, system administration records, access logs, software licences                                                                                                 |
| Legal                        | Contracts, legal correspondence, litigation files, regulatory compliance records, intellectual property records                                                            |
| Insurance                    | Insurance policies, claims records                                                                                                                                         |

## 8. Processing of Personal Information

In compliance with Section 51(1)(c)(ii) of PAIA (as introduced by POPIA), the following information describes how Macrotec processes personal information.

### 8.1 Purpose of Processing Personal Information

Macrotec processes personal information for the following purposes:

- Administration of employment relationships (recruitment, payroll, benefits, leave, performance management).
- Fulfilment of contractual obligations with clients, suppliers, and business partners.
- Client and counterparty due diligence, including know-your-customer (KYC) screening, sanctions and export control compliance, anti-bribery and anti-corruption compliance, and beneficial ownership verification.
- Compliance with legal and regulatory obligations (tax, labour law, health and safety, environmental reporting, anti-money laundering, sanctions, export controls).
- Marketing and business development (client relationship management, distribution of product information to persons who have opted in).

- Security of premises, systems, and intellectual property.
- Dispute resolution, legal proceedings, and regulatory enquiries.

## 8.2 Categories of Data Subjects and Personal Information Processed

**Table 8: Categories of Data Subjects and Personal Information Processed**

| Category of Data Subject        | Personal Information That May Be Processed                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|---------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Employees and contractors       | Name, identity number, contact details, address, qualifications, employment history, salary and banking details, tax information, leave records, performance records, health and safety records, disciplinary records, training records, monitoring data (email, internet, CCTV, vehicle tracking, access control)                                                                                                                                                                                                                                                                                      |
| Clients and prospective clients | Company name and registration details, contact person name, email, telephone, physical and postal address, VAT and tax identification numbers, beneficial ownership information (names, identity numbers, and nationality of beneficial owners and directors), sanctions and PEP (politically exposed person) screening results, anti-bribery and anti-corruption due diligence records, export control classification information, source of funds or financing arrangements (where required), bank and payment details, credit references, project-specific correspondence and technical requirements |
| Suppliers and subcontractors    | Company name, contact person name, email, telephone, address, registration and VAT numbers, banking details, trade references                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Distributors and agents         | Company name and registration details, contact person name, email, telephone, physical and postal address, VAT and tax identification numbers, beneficial ownership information (names, identity numbers, and nationality of beneficial owners and directors), sanctions and PEP screening results, anti-bribery and anti-corruption due diligence records, export control classification information, bank and payment details, credit references, territory and performance information, commission records                                                                                           |
| Website visitors                | IP address, browser information, pages visited, cookies (as disclosed in Macrotec's website privacy notice)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Job applicants                  | Name, identity number, contact details, physical and postal address, CV, employment history, educational qualifications and institutions attended, professional registrations, references and referee contact details, criminal record checks (where lawful and role-appropriate), credit checks (where lawful and role-appropriate), interview and evaluation records, psychometric or skills assessment results (where applicable), drivers licence details (for roles requiring vehicle operation)                                                                                                   |

### 8.3 Recipients of Personal Information

Macrotec may supply personal information to the following recipients or categories of recipients where necessary and lawful:

**Table 9: Recipients of Personal Information**

| Category of Personal Information      | Recipients                                                                                         |
|---------------------------------------|----------------------------------------------------------------------------------------------------|
| Employee tax and payroll data         | South African Revenue Service (SARS), payroll service provider                                     |
| Employee compensation and injury data | Department of Employment and Labour, Compensation Fund                                             |
| Employee skills development data      | Relevant SETA                                                                                      |
| Employee health and safety data       | Department of Employment and Labour, medical practitioners                                         |
| Client and project data               | Subcontractors and suppliers (as required for project execution), shipping and logistics providers |
| Financial data                        | Auditors, banks, credit agencies                                                                   |
| Legal and regulatory data             | Legal advisors, courts, regulatory authorities                                                     |
| Marketing data                        | Email marketing platform provider                                                                  |

### 8.4 Planned Transborder Flows of Personal Information

Macrotec operates across multiple jurisdictions in Africa, the Middle East, and Indian Ocean Islands. Personal information may be transferred to or processed in countries other than South Africa in the following circumstances:

- Employee personal information for staff deployed to project sites outside South Africa.
- Client and project correspondence with counterparties in other jurisdictions.
- Cloud-based systems where data may be stored on servers outside South Africa (subject to appropriate safeguards and operator agreements).

Where personal information is transferred outside the Republic, Macrotec ensures that adequate safeguards are in place in accordance with Section 72 of POPIA, including written agreements with recipients that impose equivalent data protection obligations.

### 8.5 Information Security Measures

Macrotec implements the following categories of security measures to ensure the confidentiality, integrity, and availability of personal information:

- **Technical measures:** Encryption of data in transit and at rest (where feasible), access controls based on role and need-to-know, multi-factor authentication for sensitive systems, network security (firewalls, anti-malware), regular backups.
- **Organisational measures:** Confidentiality agreements with all employees and contractors, data protection training, incident response procedures, access logging and monitoring.

- **Physical measures:** Access-controlled facilities, secure document storage, clean desk policy, secure disposal of paper and electronic records.

A detailed description of Macrotec's data protection policies and procedures is available in the POPIA Compliance Policy: Employee Personal Information (MAC-POL-LEG-001).

## 9. Request Procedure

### 9.1 How to Submit a Request

Any person who wishes to request access to a record held by Macrotec shall complete the prescribed Form 2: Request for Access to Record (Regulation 7) and submit it to the Information Officer at the address or email provided in Section 3.

Form 2 is available from: <https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>

A copy may also be obtained from Macrotec upon request.

The request shall:

- Be made in the prescribed form (Form 2).
- Provide sufficient detail to identify the record(s) requested.
- Indicate the form in which access is required (e.g. inspection, copies, electronic).
- State the right the requester is seeking to exercise or protect and explain why the record is required to exercise or protect that right.
- Include the requester's contact details and, if applicable, proof of identity.

### 9.2 Response Timeframe

Macrotec will respond to a request within 30 days of receipt. This period may be extended by a further 30 days if:

- The request is for a large number of records or requires a search through a large number of records, and compliance within the original period would unreasonably interfere with the activities of Macrotec.
- The request requires consultation with another body or person that cannot reasonably be completed within the original period.
- The requester consents to an extension.

The requester will be notified in writing if an extension is required.

### 9.3 Decision and Notification

The Information Officer will notify the requester in writing of the decision to grant or refuse access, using the prescribed Form 3: Outcome of Request and of Fees Payable (Regulation 8). If access is refused, the notification will state the reasons for refusal and inform the requester of the right to lodge a complaint with the Information Regulator in terms of Section 77A of PAIA. A requester may only apply to a court for relief under Section 82 of PAIA after first exhausting the complaint procedure with the Information Regulator.

Form 3 is available from: <https://info regulator.org.za/wp-content/uploads/2020/07/Form-3-PAIA.pdf>

## 9.4 Form of Access

If access is granted, the record will be made available in the form requested, unless doing so would unreasonably interfere with the effective administration of Macrotec or damage the record. In such cases, an alternative form of access will be offered.

## 10. Fees

### 10.1 Request Fee

A request fee, as prescribed by the Regulations to PAIA (as amended from time to time), is payable upon submission of a request for access to a record. The applicable amount is available from the Information Officer upon request.

The request fee is not payable if the requester is a personal requester (i.e. requesting access to their own personal information).

### 10.2 Access Fee

If access is granted, an access fee may be payable. The access fee covers the cost of searching for and preparing the record and providing access in the requested form. Access fees are prescribed by regulation and include:

- Photocopying (per A4 page).
- Printed copies from electronic records.
- Copy on computer-readable format (CD, USB, email).
- Transcription of visual images.
- Search and preparation fees (per hour or part thereof).
- Postal charges (if the record is posted).

A schedule of prescribed fees is available from the Information Officer upon request.

### 10.3 Fee Waivers

No access fee is payable if the request is for a record containing the personal information of the requester, unless the search and preparation time exceeds the prescribed hours.

### 10.4 Deposit

Where the search for and preparation of a record would, in the opinion of Macrotec, require more than the hours prescribed for this purpose, Macrotec may require the requester to pay a deposit of not more than one-third of the access fee that would be payable if the request is granted, before continuing to process the request.

## 11. Grounds for Refusal

Macrotec may refuse access to records on the grounds set out in Chapter 4 of Part 3 of PAIA (Sections 63 to 69), including:

- **Section 63:** Protection of the privacy of a third party who is a natural person.
- **Section 64:** Protection of the commercial information of a third party.
- **Section 65:** Protection of certain confidential information of a third party.
- **Section 66:** Protection of the safety of individuals and property.
- **Section 67:** Protection of records privileged from production in legal proceedings.
- **Section 68:** Protection of the commercial information of Macrotec.
- **Section 69:** Protection of research information of Macrotec or a third party.

Notwithstanding the above grounds, Section 62 of PAIA requires Macrotec to grant access to a record if its disclosure would reveal evidence of a substantial contravention of, or failure to comply with, the law, or an imminent and serious public safety or environmental risk, and the public interest in the disclosure clearly outweighs the harm contemplated in the applicable ground for refusal.

Where a request is refused, the requester will be informed in writing of the reason for refusal and of the right to lodge a complaint with the Information Regulator in terms of Section 77A of PAIA. A requester may only apply to a court for relief under Section 82 of PAIA after first exhausting the complaint procedure with the Information Regulator.

## 12. Availability of This Manual

12.1. This manual is available on the Macrotec website at [macrotecengineering.com/paia](http://macrotecengineering.com/paia).

12.2. A copy is available for inspection at the head office of Macrotec during normal business hours.

12.3. A copy will be provided to any person upon request, subject to payment of a reasonable prescribed fee for reproduction.

12.4. A copy is available to the Information Regulator upon request.

12.5. A fee for a copy of this manual, as contemplated in Annexure B of the Regulations to PAIA, shall be payable per each A4-size photocopy made.

## 13. Updating of This Manual

The Information Officer will review and update this manual on an annual basis, or sooner if there are material changes to Macrotec's operations, record categories, or processing of personal information.

## 14. Document Control

**Classification:** Internal

**Retention Period:** Indefinite (active manual)

**Next Review Date:** 25 June 2027

**Related Documents:** MAC-POL-LEG-001