

**SECTION 51 PAIA MANUAL
FOR
COIMBRA CONFECTIONARY
(PTY) LTD**

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1. LIST OF ACRONYMS AND ABBREVIATIONS

"CEO"	CHIEF EXECUTIVE OFFICER
"DIO"	DEPUTY INFORMATION OFFICER;
"IO"	INFORMATION OFFICER;
"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

2. PURPOSE OF THIS PAIA MANUAL

This PAIA Manual's intended use for the public is 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;
- 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. AVAILABILITY OF THIS MANUAL

A copy of this manual is available: -

- On the Coimbra Confectionary (Pty) Ltd website

- www.pie-in-the-sky.co.za

- At the head office of Coimbra Confectionary (Pty) Ltd for public inspection during normal business hours
- To any person upon request and upon the payment of a reasonable prescribed fee
- To the Information Regulator on request

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.

4. UPDATING OF THE MANUAL

This manual will be updated as required.

5. KEY CONTACT INFORMATION FOR THE INFORMATION OFFICER AND DEPUTY INFORMATION OFFICERS

Name of Information Officer:

Mr. Sergio Luiz

Name of Deputy Information Officers:

Mr. Leon Jantjies
Mr. Andrew Palmer
Mrs. Nadia van der Vent
Ms. Lorraine Gandawa

Postal Address of Coimbra Confectionary (Pty) Ltd

15 Marconi Road, Montague Gardens, Cape Town, 7441

Physical Address of Coimbra Confectionary (Pty) Ltd:

15 Marconi Road, Montague Gardens, Cape Town, 7441

Contact number:

+27 21 683 3050 (switchboard)

POPI related email address of Coimbra Confectionary (Pty) Ltd:

customerservice@pie-in-the-sky.co.za

6. PROCESSING OF PERSONAL INFORMATION AS REFERRED TO IN SECTION 10: SECTION 51(1)(B)

Coimbra Confectionary (Pty) Ltd uses personal information in different ways in its day-to-day normal business operations.

The data collected by Coimbra Confectionary (Pty) Ltd has been classified into different data segments.

The purpose is to categorize the personal and other data into easily identifiable categories of data.

Processing is limited to enabling Coimbra Confectionary (Pty) Ltd to carry out its business related activities, such as delivering its products to customers and paying its employees and service providers.

7. THE LATEST NOTICE IN TERMS OF SECTION 52(2) (IF ANY):

At this stage, no notice(s) has/have been published on the categories of records that are automatically available without a person having to request access in terms of PAIA.

8. LIST OF RECORDS AND INFORMATION HELD AT OUR PHYSICAL ADDRESS BY COIMBRA CONFECTIONARY (PTY) LTD

The information held by Coimbra Confectionary (Pty) Ltd has been divided into different categories grouped into various subjects, each of which describes a sub-set of data information collected and held.

The categories of information are not exhaustive but are merely meant to give a broad indication of the information subject and categories held by Coimbra Confectionary (Pty) Ltd, without specification.

A category may therefore contain sub-categories and sub-sets of information, which may not be specifically listed.

8.1 COMPANIES ACT RECORDS, ACTS AND STATUTORY COMPLIANCE RECORDS

- Documents of incorporation (Founding Documents)
- Memorandum and Articles of Association
- Records relating to the appointment of directors/ auditor/ secretary/ public officer and other officers
- Basic Conditions of Employment 75 of 1997
- Companies Act 71 of 2008
- Compensation for Occupational Injuries and Health Diseases Act 130 of 1993
- Employment Equity Act 55 of 1998
- Income Tax Act 95 of 1967
- Labour Relations Act 66 of 1995
- Occupational Health and Safety Act 85 of 1993
- Promotion of Access to Information Act 2 of 2000
- Unemployment Insurance Act 63 of 2001
- Value Added Tax Act 89 of 1991
- Statutory Returns and Statutory Records

8.2 PERSONNEL DOCUMENTS AND RECORDS

- Employment contracts
- Employment Equity Plan

- Disciplinary records
- Salary records
- SETA records
- Disciplinary code
- Leave records
- Training records
- Training Manuals
- Employee Identity Numbers
- Employee addresses
- Employee names
- Employee qualifications
- Staff administration (employee records and information)
- Staff includes potential and existing staff
- Information relating to Health and Safety Regulations
- Performance Appraisals
- Personnel Guidelines, Policies and Procedures
- Remuneration Records and Policies
- Skills Requirements
- Staff Recruitment Policies
- Training Records
- Attendance registers
- Correspondence

8.3 FINANCIAL RECORDS

- Annual Financial Statements
- Tax Returns
- Accounting Records and financial dealings
- Banking Records
- Bank Statements
- Electronic banking records
- Asset Register
- Rental Agreements
- Invoices
- Customer Details-Vat Numbers-delivery addresses-email addresses-client company details
- Budgets
- Management Accounts
- Purchasing and Order Information
- Stock Records
- Tax Records (company and employee)
- Client and Customer Registry
- Contracts

8.4 CLIENT AND 3RD PARTY SUPPLIER DATA

- Client company/trading details-invoices with VAT numbers, company registration details etc.
- Supplier contracts and supplier contact details
- Customer contracts and customer details
- Sales Records
- Suppliers Registry

9. RECIPIENTS OR CATEGORIES OF RECIPIENTS TO WHOM PERSONAL INFORMATION MAY BE SUPPLIED

Examples are provided below and is not exhaustive.

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus

10. TRANSBORDER FLOWS OF PERSONAL INFORMATION (IF ANY)

Coimbra Confectionary (Pty) Ltd stores all personal information locally on servers, and on local backups in the cloud.

Should any information be transferred outside of the borders of South Africa, a request for consent will be sent to the data subject.

11. GENERAL DESCRIPTION OF INFORMATION SECURITY MEASURES TO BE IMPLEMENTED BY COIMBRA CONFECTIONARY (PTY) LTD TO ENSURE THE CONFIDENTIALITY, INTEGRITY AND AVAILABILITY OF THE INFORMATION

Coimbra Confectionary (Pty) Ltd has clearly defined the requirements for information security within the company and is committed to statutory, regulatory and contractual obligations as part of our planning processes.

It is a fundamental principle of Coimbra Confectionary (Pty) Ltd that the controls and procedures of our information security programme consider our business requirements and these requirements and needs are regularly communicated to all relevant staff via staff training and development programs and internal awareness meetings.

This approach addresses the associated risks to the information assets and includes risks such as:

- Uncontrolled access, connections, and unintentional user errors
- Security of the information systems compromised by unsupported business practices
- Ensuring the integrity and validity of data
- Poor operating procedures
- Malicious code and viruses
- Uncontrolled system or data changes
- Internet and public domain access

- Breach of legislation or non-compliance with regulatory or ethical standards
- To reduce the impact of information security breaches by ensuring incidents are followed up consistently, timeously and correctly as per our incident policy and procedures in order to help identify and deal with areas for improvement to decrease the risk and impact of future incidents.

The implemented controls shall be reviewed annually or if the need arises and adjusted where necessary.

12. GUIDE ON HOW TO USE PAIA AND ACCESS THERETO

A copy of the guide can be accessed at: -

https://infoeregulator.org.za/wp-content/uploads/2020/07/PAIA-Guide-English_20210905.pdf

13. DETAILS ON HOW TO MAKE A REQUEST FOR ACCESS - SECTION 51(E)

The requester must complete Form 2 and Form 3 (also available on the Coimbra Confectionary (Pty) Ltd website) and submit these forms together with a request fee, where necessary, to the Information Officer (Coimbra Confectionary (Pty) Ltd) at the provided physical / postal address or email address.

The forms must:

- provide sufficient particulars to enable the Information Officer of the private body to identify the record/s requested and to identify the requester;
- indicate which form of access is required;
- specify a postal address or fax number or email address of the request in the Republic;
- identify the right that the requester is seeking to exercise or protect;
- provide an explanation of why the requested record is required for the exercise or protection of that right.

In addition to a written reply, if the requester wishes to be informed of the decision on the request in any other manner, the requester is to state that manner or format and the necessary particulars to be informed of in any other manner.

If the request is made on behalf of another person, the requester is to submit proof of capacity in which the requester is making the request, to the reasonable satisfaction of the head of the private body, as described above.



Information Officer

14/11/2025

Date