
IADS INFORMATION MANUAL

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DOCUMENT INFORMATION

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AUTHOR:	E Subben: Head of Corporate Governance
APPROVED BY:	J Joubert: CEO

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CHANGE CONTROL RECORD

The following table defines the document change detail, as well as reference to the change control documentation.

ISSUE	CHANGE DESCRIPTION	EFFECTIVE DATE	CHANGE NUMBER
01	Initial Release	2021-06-30	N/A

ABBREVIATIONS

BBBEE	Broad Based Black Economic Empowerment
CEO	Chief Executive Officer
CIPC	Company and Intellectual Property Commission
FTE	Flight Test Engineer
FTI	Flight Test Instrumentation
IADS	Incomar Aerospace and Defence Systems
IT	Information Technology
PAIA	Promotion of Access to Information
POPI	Protection of Personal Information
POPIA	Protection of Personal Information Act
SAHRC	South African Human Rights Commission
VAT	Value Added Tax

DEFINITIONS AND TERMINOLOGY

Act	Promotion of Access to Information Act, Act 2 of 2000, as amended by the Protection of Personal Information Act (POPIA) as well as section 18 of POPIA.
Information Officer	The person acting on behalf of Incomar and discharging the duties and responsibilities assigned to the head of the Company by the Act. The Information Officer is duly authorised to act as such and such authorisation has been confirmed by the “head” of Incomar in writing.
Manual	This manual published in compliance with Section 51 of the Act.
Record	Any recorded information, regardless of form or medium, which is in the possession or under the control of Incomar, irrespective of whether or not it was created by Incomar.
Request	A request for access to a record of Incomar.
Requestor	Any person, excluding a public body or an official thereof, making a request for access to a record of Incomar and includes any person acting on behalf of that person.

1 SCOPE

1.1 Identification

1.1.1 This manual aims to facilitate a request for access to information held by Incomar Aerospace and Defence Systems (IADS), if the information is required for the exercise or protection of any rights, as well as to provide for the right to privacy of all persons by:

- disclosing the types of records held and to facilitate the requests for access to records held; and
- creating awareness of the type and source of information being collected, the purpose of collecting and processing such information.

1.2 Purpose

1.2.1 This document is compiled in accordance with Section 51 of the Promotion of Access to Information Act (PAIA) [Ref 1], as amended by the Protection of Personal Information Act (POPIA) [Ref 2] as well as section 18 of POPIA.

1.2.2 PAIA gives effect to the provisions of Section 32 of the Constitution and POPIA gives effect to the provisions of, inter alia, Section 14 of the Constitution.

1.3 Applicability

1.3.1 This process applies to all interested stakeholders.

2 REFERENCES

2.1 Applicable Documents

2.1.1 External Documents

Ref	Document Number	Document Title
[Ref 1]	Act 2 of 2000	Promotion of Access to Information Act
[Ref 2]	Act 4 of 2013	Protection of Personal Information Act

2.1.2 Internal Documents

Ref	Document Number	Document Title
[Ref 3]	901C-0000-350000-001-T20	Request for Access to IADS Records
[Ref 4]	901C-0000-350000-002-T20	IADS Objection to Processing of Personal Information
[Ref 5]	901C-0000-350000-003-T20	IADS Request for Correction or Deletion of Personal Information
[Ref 6]	901C-0000-350000-004-T20	IADS Complaint for Protection of Information

2.1.3 Order of Precedence

In any event of conflict between the text and [Ref 1] and [Ref 2], the requirements in [Ref 1] and [Ref 2] take preference. For all other conflicts between the text of this document and the references cited herein, the text of this document takes precedence, unless otherwise noted herein or in the contract. Nothing in this document, however, supersedes applicable laws and regulations unless a specific exemption has been obtained.

3 COMPANY BACKGROUND

3.1 Company Overview

3.1.1 IADS, hereinafter referred to as Incomar, was established in South Africa in 2013, primarily involved in military aircraft, weapons and avionics integration and flight testing.

3.1.2 IADS is now well established in both the local and international industry, having developed a strong engineering capability with a number of specialist areas.

3.1.3 The core values of IADS are:

- Integrity
- Credibility
- Efficiency
- Adaptability
- Innovation
- Social Responsibility

3.1.4 IADS is a Level 2 BBBEE contributor in South Africa with various enterprise development initiatives.

3.1.5 Furthermore, IADS is an AS9100D certified organisation for design and development of software and hardware electronic systems and flight testing.

4 CONTACT DETAILS

4.1 Company Details

4.1.1 The company contact details are as follows:

Full Name: Incomar Aerospace and Defence Systems

Physical Address: 2 Grevillea Street
Highveld Techno Park
Centurion
South Africa

Telephone: 012 665-4056 (Switchboard)

Website: <http://www.iadsystems.co.za/>

4.2 Company Contact Details

4.2.1 The Chief Executive Officer is Mr J.W.J Joubert, and who can be contacted at:

Telephone: 012 665-4056 (Switchboard)

Email: johannes.joubert@incomargroup.com

4.2.2 The Chief Executive Officer (CEO) has delegated the responsibility of Information Officer in terms of this Act to Mr E. Subben who is the Head of Corporate Governance, and who also serves as Information Officer as referred to in the Protection of Personal Information Act 4 of 2013, after registration with the Information Regulator. He can be contacted at:

- Telephone: 012 665-4056 (Switchboard)
- Email: information.officer@incomargroup.com

4.2.3 The Information Officer may appoint, where it is deemed necessary, Deputy Information Officers, as allowed in terms of section 17 of the Act as well as section 56 of the Protection of Personal Information Act 4 of 2013. This is in order to render Incomar as accessible as reasonably possible for requesters of its records and to ensure fulfilment of its obligations and responsibilities as prescribed in terms of section 55 of the Protection of Personal Information Act 4 of 2013. All requests for information in terms of this Act must be addressed to the Information Officer.

4.3 SA Human Rights Commission Details

4.3.1 In order to assist those who are not familiar with PAIA requests, the South African Human Rights Commission (SAHRC) has compiled a guide, as contemplated in Section 10 of the Act, containing information to assist any person who wishes to exercise any right contemplated in this Act.

4.3.2 The contact details of the SAHRC PAIA Unit – The Research and Development Department are as follows:

Physical Address: 27 Stiemans Street

Braamfontein

Postal Address: Private Bag X2700, Houghton, 2041

Telephone: 011 877-3803

Fax: 011 403-0625

Website: <https://www.sahrc.org.za>

5 RECORDS AVAILABLE WITHOUT A REQUEST

5.1 Latest Notice in Terms of Section 52(2)

- 5.1.1 At this stage, no notice has been published on the categories of records that are automatically available without a person having to request access in terms of Section 52(2) of the Act.
- 5.1.2 The company website <http://www.iadsystems.co.za/> is however accessible to anyone who has access to the Internet and is voluntarily disclosed.
- 5.1.3 Other non-confidential records, such as statutory records maintained at the Company and Intellectual Property Commission (CIPC), may also be accessed without the need to submit a formal application. An appointment will still have to be made with the Information Officer to view such records.

6 RECORDS NOT AUTOMATICALLY AVAILABLE

6.1 Legislative Records Available

6.1.1 The following records are retained in accordance with applicable legislation:

- Basic Conditions of Employment Act 75 of 1997
- Broad Based Black Economic Empowerment Act, 2003
- Civil Aviation Act 13 of 2009
- Companies Act 71 of 2008
- Compensation of Occupational Injuries and Disease Act 130 of 1993
- Constitution of the Republic of South Africa, 2008
- Disaster Management Act 57 of 2002
- Electronic Communications Act 36 of 2005
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998
- Financial Intelligence Centre Act,38 of 2001
- Income Tax Act 58 of 1962
- Labour Relations Act 66 of 1995
- National Conventional Arms Control Act 41 of 2002
- Occupational Health and Safety Act 85 of 1993
- Promotion of Access to Information Act 2 of 2000
- Protection of Personal Information Act 4 of 2013
- Skills Development Levies Act 9 of 1999
- Unemployment Contributions Act 63 of 2001
- Unemployment Insurance Act 30 of 1996
- Value Added Tax Act 89 of 1991

Note: Although we have used our best endeavours to supply a list of applicable legislation, it is possible that this list may be incomplete. Whenever it comes to our attention that existing or new legislation allows a requester access on a basis other than as set out in PAIA, we shall update the list accordingly. If a requester believes that a right of access to a record exists in terms of other legislation listed above or any other legislation, the requester is required to indicate what legislative right the request is based on, to allow the Information Officer the opportunity of considering the request in light thereof.

6.2 Company Records Available

Category	Records retained
Statutory and Regulatory	Annual financial statements
	Statutory records & returns, including incorporation documents, memorandum of incorporation and share registers and certificates
	Minutes of board and shareholder meetings
	Contractual and legal agreements
	Aircrew licenses
	Health and safety records
	COVID-19 records
Finance & Accounting Records	Financial and Accounting policies, processes & procedures
	Financial and Accounting Records
	Auditors' reports
	Tax and VAT records
Human Resources Records	Human Resource policies, processes & procedures
	Human Resource records provided by personnel
	Conditions of employment and other personnel related contracts and records
	Internal correspondence and records
	Competence and Training records
	Satisfaction or Grievance records
Information Technology (IT) Records	IT policies, processes and procedures
	Hardware and Software Registers + Licenses
	IT Access control records
Customer Records	Customer related policies, processes and procedures

Category	Records retained
	Customer order records, eg. purchase orders, requirements / requests, deliverables, etc.
	Customer financial records
	Business agreements and contracting conditions
	Customer Satisfaction Survey records
Procurement Records	Supplier related policies, processes and procedures
	Supplier registration and approval records
	Supplier order records, eg. requests, quotes, purchase orders
	Business agreements and contracting conditions
	Goods receiving and inspection records
	Supplier financial records
Business and Quality Management	Company policies, processes, procedures, templates, etc.
	General company records, eg. minutes of meetings, registers, forms, etc.
	Statutory and Regulatory compliance records
	Quality Management System records
	Company Asset Registers
	Insurance Policies and Claims Records

7 ACCESS PROCEDURE

7.1 Request a Record

- 7.1.1 Requests for access to records must be made to the Information Officer in the prescribed form [Ref 3] at the address, fax number or electronic mail address referred to in 4.1 above. Failure to make use of the prescribed form could result in your request being refused or delayed.
- 7.1.2 A request for access to a record must be accompanied by payment of an initial non-refundable request fee of R50.00. This fee is not applicable to personal requests, i.e., individual seeking access to records pertaining him/herself.
- 7.1.3 The requestor must provide sufficient detail on the request form to enable the Information Officer to clearly identify the record as well as the requestor's identity, which is to be accompanied by positive proof of identification.
- 7.1.4 The requestor must indicate which form of access is required and if he/she wishes to be informed on the decision on the request in any other manner, to state the necessary particulars to be so informed.
- 7.1.5 Access is not automatic and the requestor must therefore identify the right he/she is seeking to exercise or protect and provide an explanation as to why the requested record is required for the exercise or protection of that right.
- 7.1.6 If a request is made on behalf of a person, the requestor must then submit proof, to the satisfaction of the Information Officer, of his/her authority to make the request. Failure to do so will result in the request being rejected.

7.2 Request Decision

- 7.2.1 The requestor will be notified, within 30 days, in the manner indicated by him/her of the outcome of his/her request, alternatively whether an extension not exceeding 30 days is required to deal with the request.
- 7.2.2 If the request for access is granted a further access fee must be paid for the reproduction as well as the search and preparation of the records and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure. Access will be withheld until the requestor has made payment of the applicable fee(s). The fees payable in respect of access to Records are attached as Appendix A.
- 7.2.3 In the event that the request for access is refused, reasons for the refusal will be provided and the requestor will be advised that he/she may lodge an application with a court against the refusal of the request, as well as the procedure for lodging the application.
- 7.2.4 The main grounds for refusing a request for information relates to:
- mandatory protection of the privacy of a third party, as included in the Protection of Personal Information Act 4 of 2013, which would involve the unreasonable disclosure of personal information;
 - mandatory protection of personal information and for disclosure of any personal information to, in addition to any other legislative, regulatory or contractual agreements, comply with the provisions of the Protection of Personal Information Act 4 of 2013;

- mandatory protection of the commercial information of Incomar or third parties;
- mandatory protection of confidential information of Incomar or 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 would be regarded as privileged in legal proceedings.

7.3 Request Remedies

- 7.3.1 Incomar does not have an internal appeal procedure. The decision made by the Information Officer is final, subject to agreement with the CEO. Requesters will have to exercise such external remedies at their disposal if the request for information is refused, and the requestor is not satisfied with the answer supplied by the Information Officer.
- 7.3.2 A requestor that is dissatisfied with the Information Officer's refusal to disclose information, may within 30 (thirty) days of notification of the decision, apply to a Court for relief.
- 7.3.3 A third party dissatisfied with the Information Officer's decision to grant a request for information, may within 30 (thirty) days of notification of the decision, apply to a Court for relief.
- 7.3.4 For purposes of the Act, the Courts that have jurisdiction over these applications are the Constitutional Court, the High Court or another court of similar status and a Magistrate's Court designated by the Minister of Justice and Constitutional Development and which is presided over by a designated Magistrate.

7.4 Availability and Updating of the Manual

- 7.4.1 This manual is made available and will be updated at such intervals, as may be deemed necessary.
- 7.4.2 This Manual is available on the company website, <http://www.iadsystems.co.za>, alternatively at 2 Grevillea Street, Highveld Techno Park, Centurion, South Africa, during office hours.

8 PROTECTION OF PERSONAL INFORMATION

8.1 Introduction to POPIA

8.1.1 PAIA requires Incomar to provide you with certain information related to the Protection of Personal Information Act 4 of 2013. This information relates to how Personal Information that we process is, amongst others, used, disclosed and destroyed. We are also required to provide you with information on your rights in relation to Personal Information that is collected, processed and stored.

8.1.2 Incomar is committed to its data privacy obligations and we will be receptive to any queries or requests made by you in relation to your personal information.

8.2 Personal Information Processing

8.2.1 The identified categories of data subjects and categories of personal information that Incomar processes is shown below:

Date Subject Category	Category of Personal Information
Client – Juristic Persons / Entities	Names of contact persons; Name of Legal Entity; Physical and Postal address and contact details; Registration Number; Tax related information; authorised signatories, Customer Satisfaction Surveys
Employees	Nationality; Gender; Race; Pregnancy; Marital Status; Colour; Age; Language; Education Information; Banking Information; Employment History; ID number; Passport number; Physical and Postal address; Contact details; Medical Information; Employee Contracts and Salary Records; Competence and Training records; Employee Satisfaction Surveys
Contractors / Suppliers / Vendors	Names of contact persons; Name of Legal Entity; Physical and Postal address and contact details; Banking information; Registration Number; Founding documents; Tax related information; authorised signatories, beneficiaries, ultimate beneficial owners
Visitors to Incomar	Names of contact persons; ID number; Contact details; Medical Information
Potential Employees	Nationality; Gender; Race; Marital Status; Age; Language; Education Information; Employment History; ID number, Passport number; Physical and Postal address; Contact details

8.3 Why we process personal information

- POPIA provides the minimum conditions regarding lawful processing of personal information and in a reasonable manner that does not infringe on a person's privacy. The type of personal information that Incomar processes will depend on the purpose

for which it is collected, but is generally in **direct** support of business and organisational functions, including but not limited to:

- Recruitment and Human Resource management of employees;
- Performing duties in terms of any agreement with clients;
- Make or assist in making decisions about clients or suppliers;
- Communicate with clients or potential clients about Incomar's products and/or services;
- Administration or operational support to clients;
- Complying with regulatory and other obligations imposed on Incomar;
- Any other reasonably required purpose related to Incomar's business.

8.3.1 Incomar will ensure that all personal information:

- is processed lawfully, fairly and transparently;
- is processed only for the purposes for which it was collected;
- will not be processed for secondary purposes unless that processing is compatible with the original purpose;
- is adequate, relevant and not excessive for the purpose for which it was collected;
- is accurate and kept up to date;
- will not be kept for longer than necessary;
- is processed in accordance with integrity and confidentiality, including physical and organisational measures to ensure an appropriate level of security when stored, used and communicated; and
- is processed in accordance with the rights of the information owner, where applicable, and ensure owners:
 - are notified that their information is collected or when a breach of data occurs;
 - know whether Incomar holds personal information and how to access that information;
 - know how to request the correction or deletion of inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained personal information;
 - object to Incomar's use or request the deletion of personal information; and
 - complain to the Information Regulator regarding alleged infringement of any of the rights and/or to institute civil proceedings regarding alleged non-compliance with the protection of personal information.

8.4 Where we transfer personal information

8.4.1 Incomar may supply personal information to these potential recipients:

- Clients – Juristic Persons / Entities

- Management / Employees
- Contractors / Suppliers / Vendors
- Regulatory and government authorities, where Incomar has a duty to share such information

8.4.2 Incomar has agreements in place to ensure that other parties comply with our confidentiality and privacy requirements. Personal information may also be disclosed where Incomar has a legal duty to do so.

8.4.3 If Incomar does transfer personal information to third parties outside of South Africa, Incomar will ensure that the recipient of the information is subject to a law, binding corporate rules or binding agreement which provide an adequate level of protection.

8.5 Securing personal information

8.5.1 Incomar employs appropriate, reasonable technical and organisational measures to prevent loss of, damage to or unauthorised destruction of personal information and unlawful access to or processing of personal information. This is achieved through, including but not limited:

- Access control to Incomar premises and restricted areas, including the server room
- Key control and registers for restricted areas, safes, strongrooms, walk-in safes, etc.
- User Access Control on server folders/files and Configuration Management System to prevent unauthorized persons from gaining access to personal information, all documents are distributed on a strict need-to know basis only
- Password protection, local encryption and auto-locking of all Incomar laptops
- Use of Virtual Private Networks, firewalls, virus protection, encryption for secure storage and retrieval of personal information
- On-site and off-site backups of all server information
- Shredding of discarded and obsolete documentation
- Secure deletion of electronic information, where required

8.6 Personal Rights and Access Requests

8.6.1 In terms of POPIA, information owners have a right to access personal information that we hold. Incomar will therefore have the responsibility to provide you with information on whether we hold any of your personal information or not.

8.6.2 If Incomar does hold any personal information, the owner has the right to the record or a description of the personal information including information about the identity of all third parties, who have, or have had, access to the information, refer Section 7 for more details.

8.6.3 All owners are entitled to request rectification, deletion, blocking or completion of your personal information which is shown to be inaccurate or incomplete and, in certain circumstances, to object to the processing of your personal information.

8.7 Data Subject Objection

- 8.7.1 Anyone has the right to object at any time to Incomar processing their personal information, if Incomar is processing it on the basis that it protects your legitimate interest, it is necessary for the proper performance of a public law duty, or processing it is necessary for pursuing our legitimate interests or of a third party to whom we supply the information to.
- 8.7.2 Anyone also has the right to object if Incomar processes your personal information for purposes of direct marketing.
- 8.7.3 All objections must be submitted on [Ref 4]. If anyone has any queries on submitting [Ref 4], Incomar will provide reasonable assistance free of charge.

8.8 Data Subject Update

- 8.8.1 Anyone may make a request to Incomar to correct or delete personal information in Incomar's possession that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully; or destroy or delete a record of personal information about you that Incomar is no longer authorised to retain. This is done using [Ref 5].
- 8.8.2 Once Incomar receives a request Incomar will as soon as reasonably possible correct or destroy or delete the information or provide the requestor, to your satisfaction, with credible evidence in support of the information.
- 8.8.3 In the case where Incomar cannot reach an agreement in terms of correcting the personal information, the requestor may request that Incomar attach a note indicating that the requestor has asked for the correction of personal information, but it has not been made.

8.9 Lodging Complaints

- 8.9.1 If anyone is unhappy with the way that Incomar processes personal information and if anyone believes that Incomar is interfering with the protection of your personal information, such persons may lodge a complaint using [Ref 6].

8.10 Record Retention

- 8.10.1 Any information retained for historical purposes for periods longer than required by legislation will be stored responsibly with appropriate safeguards against the records being used for any other purpose.

8.11 Incident Management

- 8.11.1 All incidents related to breach of personal information shall be appropriately addressed and suitably documented.

APPENDIX A: FEES PAYABLE

A.1 Reproduction Fees

Where Incomar has voluntarily provided the Minister with a list of categories of records that will automatically be made available to any person requesting access thereto, the only change that may be levied for obtaining such records, will be a fee for reproduction of the record in question, as follows:

Information Reproduction Fee	Fees to be charged
Information in an A4 size page photocopy or part thereof	R1,10
A printed copy of an A4 size page or part thereof	R0,75
A copy in computer readable format, for example Compact disk	R70,00
A transcription of visual images, in an A4 size page or part thereof	R40,00
A copy of visual images	R60,00
A transcript of an audio recording for an A4 size page or part thereof	R20,00
A copy of an audio recording	R30,00

A.2 Access Fees

The applicable access fees are payable, except where payment of an access fee is specifically excluded in the terms of the Act or an exclusion is determined by the Minister in terms of Section 54(8), and are as follows:

Information Access Fee	Fees to be charged
Information in an A4 size page photocopy or part thereof	R1,10
A printed copy of an A4 size page or part thereof	R0,75
A copy in computer readable format, for example Compact disk	R70,00
A transcription of visual images, in an A4 size page or part thereof	R40,00
A copy of visual images	R60,00
A transcript of an audio recording for an A4 size page or part thereof	R20,00
A search for a record that must be disclosed *per hour or part of an hour reasonably required for the search	R30,00*
Where a copy of a record needs to be posted, the actual postal fees payable.	

A.3 Payment of Fees

All fees are subject to change, as allowed by the Act. All fees must be deposited into the Incomar bank account, which will be separately communicated for each request.