

PAIA MANUAL FOR SHIPRAZOR (PTY) LTD

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

1. LIST OF ACRONYMS AND ABBREVIATIONS

- 1.1 **"Company"** Shiprazor (Pty) Ltd
- 1.2 **"IO"** Information Officer
- 1.3 **"PAIA"** Promotion of Access to Information Act No. 2 of 2000 (as amended)
- 1.4 **"Personal Information"** means information relating to an identifiable, living natural person and, where applicable, an identifiable existing juristic person, as defined in POPIA.
- 1.5 **"Request for Access"** means a request made in terms of PAIA for access to a Record held by Shiprazor.
- 1.6 **"POPIA"** Protection of Personal Information Act No.4 of 2013
- 1.7 **"Regulator"** Information Regulator
- 1.8 **"Requestor"** any person making a Request for Access to a record of the organisation in terms of PAIA or a person acting on behalf of such person
- 1.9 **"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/ or 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. COMPANY INTRODUCTION

Shiprazor (Pty) Ltd is a technology-enabled platform that facilitates domestic and international shipping, courier aggregation, freight services, fulfilment services, shipment tracking, shipguard and some ancillary pre-order e-commerce services such as abandoned cart, one click check out, etc. for businesses and consumers.

4. CONTACT DETAILS

Information Officer (Registered in terms of POPIA and PAIA)

Name: Sahil Affriya

Tel: +27 639257984

Email: sahil@shiprazor.com

Postal/ Physical Address: 6 Concorde Crescent, Airport Industria, Cape Town, 7490

Website: www.shiprazor.com

5. AVAILABILITY OF THE PAIA MANUAL

A copy of PAIA Manual is published on the Company website (www.shiprazor.com) or is available at the head office of the Company located at 6 Concorde Crescent, Airport Industria, Cape Town, 7490 for public inspection during normal business hours.

6. AVAILABILITY OF GUIDES TO THE PAIA GUIDE

The right of access to information is protected in South Africa's Constitution, and PAIA gives effect to this right. The aim of PAIA is to foster a culture of transparency and accountability in public and private bodies and enables the South African people to exercise and protect all their rights and to realise South Africa's goals of an open and participatory democracy.

The Information Regulator of South Africa has put together a guide ("**Guide**") on PAIA, which has been designed as a user-friendly and accessible tool for any person who wishes to exercise any right in terms of PAIA, or in terms of POPI.

A copy of the Guide is available on the Information Regulator's website (<https://www.inforegulator.org.za>)

7. COMPANY RECORDS

Company holds details of its own registration as a company, together with its financial statements and all other documentation relating to its business ("**Records**").

7.1. Company Record Classification Key

Classification Number	Access	Classification (PAIA section)
1	May be disclosed	Public Access Document
2	May not be disclosed	Request after commencement of criminal or civil proceedings [s7]
3	May be disclosed	Subject to copyright

Registration No: 2023/766518/07

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info@shiprazor.com

support@shiprazor.com

4	Limited disclosure	Personal information that belongs to the Requestor of that information {s61}
5	May not be disclosed	Unreasonable disclosure {s63(1)}
6	May not be disclosed	Likely to harm the commercial or financial interests of a third party {s64(a), s64(b)}
7	May not be disclosed	Likely to harm the company or third party in contract or other negotiations {s64(c)}
8	May not be disclosed	Would breach a duty of confidence owed to a third party in terms of an agreement {s65}
9	May not be disclosed	Likely to compromise the safety of individuals or protection of property {s66}
10	May not be disclosed	Legally privileged document {s67}
11	May not be refused	Environment testing/ investigation which reveals public safety/ environmental risks {s62(2), s68(2)}
12	May not be disclosed	Commercial information of a private body {s68}
13	May not be disclosed	Likely to prejudice research and development information of the company or a third party {s69}
14	May not be refused	Disclosure in public interest {s70}

7.2 CATEGORIES OF RECORDS OF THE COMPANY WHICH ARE AVAILABLE WITHOUT FORMAL REQUEST

RECORDS	CLASSIFICATION NUMBER
PAIA Manual	1
Privacy Notice	1
Website Terms and Conditions	1
Any Information already in the public domain	1
Employment Opportunities	1

7.3 CATEGORIES OF RECORDS OF THE COMPANY WHICH MAY BE REQUESTED IN TERMS OF SECTION 52(2) OF THE ACT

RECORDS	CLASSIFICATION NUMBER
Employee Records	4, 5, 8, 9
Employee Contracts	4,5
Employee Medical Records	4, 5,8
Payroll Records	4,5
Shipment/ Delivery/ Claim records	4,5,12
Shipguard Records	4,5,12
Supplier and Service Provider Agreements	8, 12
Litigation Records	10,12
Audited Financial Statements	12
Company Tax Records	4, 12

Asset Register	12
Customer Information and Database	4,5,12
Details of Third-party Relationships	8

8. DUTIES OF THE INFORMATION OFFICER

The Information Officer of the Company is responsible for:

- a) Publishing and proper communication of the manual i.e. creating policy awareness
- b) The facilitation of any Request for Access.
- c) Providing adequate notice and feedback to the Requestor.
- d) Determining whether to grant a Request for Access to a complete/full Record or only part
- e) of a Record.
- f) Ensuring that access to a Record, where so granted, is provided timeously and in the
- g) correct format.
- h) Reviewing the policy for accuracy and communicating any amendment.

8. FORM OF REQUEST

In terms of PAIA, requests for information must be submitted using "Form 2", as prescribed in the PAIA Regulations, which is available on the Information Regulator website (<https://www.inforegulator.org.za>). All Requests for Access must be directed to our Information Officer (whose details appear at the top of this Manual).

Please note that, in accordance with PAIA regulations, fees may be payable, including a request fee and an access fee. These fees are subject to prescribed maximums and certain exemptions may apply. The fee structure is available on the Information Regulator website (<https://www.inforegulator.org.za>).

When submitting a Request for Access:

- you must state which right you are seeking to exercise or protect by requesting the information;
- if you are requesting access to any of your Personal Information which may be held by us, you must produce adequate proof of your identity; and
- provide sufficient detail to allow us to identify the Records you seek.

9. PERSONAL INFORMATION

Please refer to our Privacy Policy for a comprehensive outline of how we process Personal Information, as contemplated in POPIA. However, please note the following in respect of Personal Information processed by us:

Purpose

We process Personal Information to pursue our business objectives and strategies, including as may be required to:

- provide domestic and international shipping, courier aggregation, freight, fulfilment and logistics services;
- facilitate shipment collection, transportation, tracking, delivery and return-to-origin services;
- facilitate shipguard shipment protection, where applicable;
- onboard, verify and manage customers, suppliers, courier partners and service providers;

- provide e-commerce enablement services, including checkout, abandoned cart recovery, shipping automation and related platform services;
- communicate with customers, suppliers, courier partners and service providers;
- process payments, invoicing and account administration;
- conduct fraud prevention, risk assessments and compliance screening;
- manage employee relationships and human resources administration;
- comply with contractual, legal, regulatory and tax obligations; and
- pursue legitimate business interests, including service improvement, analytics, reporting, testing, product development and business intelligence.

Categories of Data Subjects and Information

We process Personal Information of:

- our employees (personal details, salary details, leave records, disciplinary information, performance reviews, employment contracts);
- customers (customer details, delivery addresses, shipment tracking information, delivery confirmation information, contracts, representative details and contact information, transaction Records and volumes, technical integration data);
- courier partners and service providers (contracts, invoices, technical integration data, partner information, contact details, billing information, pricing, product information, or operational and performance information);
- Platform users and website users (IP addresses, browser information, device information, cookies and related analytics data, website usage information).

Recipients of Personal Information

Personal Information may be shared with:

- our employees on a need-to-know basis or other members of the Company for internal administrative purposes;
- Courier, freight and logistics service providers;
- Shipment protection providers and claims administrators;
- Payment processors and banking institutions;
- Professional advisers, auditors and consultants;
- Cloud hosting and technology service providers;
- Identity verification and compliance service providers;
- Regulatory authorities, government agencies and law enforcement authorities where required by law;
- Third-party suppliers and service providers engaged in connection with the provision of Company's services.

Transborder Flows

Given the nature of Company's operations, Personal Information may be transferred to, stored in or accessed from jurisdictions outside the Republic of South Africa. Such transfers may occur in connection with:

- international shipping and logistics services;
- courier and freight partners operating outside South Africa;
- cloud hosting and software infrastructure;
- customer support operations;
- Shipment protection administration;

- regulatory and legal compliance obligations.

Shiprazor shall take reasonable steps to ensure that any cross-border transfer of Personal Information is carried out in accordance with POPIA and that appropriate safeguards are implemented where required.

Information Security Measures

Shiprazor maintains appropriate technical and organisational measures designed to protect Personal Information against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access. Such measures may include:

- access control and user authentication procedures;
- password protection and multi-factor authentication where applicable;
- role-based access controls;
- firewalls and network security measures;
- malware and intrusion detection systems;
- encryption of data where appropriate;
- secure cloud hosting infrastructure;
- monitoring and logging of system activity;
- backup and disaster recovery procedures;
- confidentiality obligations applicable to employees and service providers;
- staff awareness and training regarding data protection obligations; and
- incident response and data breach management procedures.

11. REMEDIES

The Company does not have other internal procedures regarding PAIA Act requests. As such, the decision made by the Information Officer is final. If a request is denied, the Requestor can apply to a court with appropriate jurisdiction.

Issued by:



Sahil Affriya

Information Officer