PAIA Manual

Société Phocéenne de Travaux South Africa (Pty) Ltd

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

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1. List of acronyms and abbreviations

Acronym	Meaning
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 2 of 2000, as amended
POPIA	Protection of Personal Information Act 4 of 2013
Regulator	Information Regulator
Republic	Republic of South Africa
SPTsa	Société Phocéenne de Travaux South Africa (Pty) Ltd

2. Purpose of this manual

This manual helps the public to:

- check which categories of records SPTsa makes available without a formal request;
- understand how to request access to a record SPTsa holds;
- know the description of the records SPTsa holds and the subjects they cover;
- know who to contact to request access;
- know about the Guide published by the Regulator and how to obtain it;
- know whether SPTsa processes personal information, for what purpose, and about whom;
- know the recipients to whom personal information may be supplied;
- know whether SPTsa plans to transfer personal information outside the Republic;
- know whether SPTsa has security measures in place to protect personal information.

3. Key contact details for access to information

Role	Contact
3.1 Head of the private body (default Information Officer)	Eric Metois, Chief Executive Officer and sole director Tel +27 21 510 0152 · admin@sptsa.co.za
3.2 Deputy Information Officer	Nicole Conradie, Admin Manager, designated Information Officer (appointed 14 April 2025), who handles all requests Tel +27 21 510 0152 · admin@sptsa.co.za, marked "Attention: Information Officer"
3.3 Access to information general contact	admin@sptsa.co.za
3.4 Head office	51 Auckland Street, Paarden Eiland, 7405 Cape Town P.O. Box 172, Paarden Eiland, 7420 Cape Town Tel +27 21 510 0152 · admin@sptsa.co.za · www.sptsa.co.za

4. Guide on how to use PAIA and how to obtain access to it

4.1 The Regulator has updated and made available the 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 explains the objects of PAIA and POPIA; the contact details of information officers; how to request access to a record; the assistance available from the Regulator and from information officers; the remedies available (internal appeal, complaint to the Regulator, and application to court); and the related notices, regulations and fees.

4.4 Members of the public may inspect or make copies of the Guide at the offices of public and private bodies, including the office of the Regulator, during normal working hours.

4.5 The Guide may also be obtained on request from the Information Officer, or from the Regulator's website: inforegulator.org.za.

4.6 A copy of the Guide is available in English and Afrikaans for public inspection at SPTsa's head office during normal office hours.

4.7 A request for access to a record must be made on Form 2 of the PAIA Regulations and sent to the Information Officer at admin@sptsa.co.za or to the head office address above.

5. Categories of records available without a request

Category	Records	Where	How to access
Company information	Company profile, services, project references, news	Website	www.sptsa.co.za
Policies	Privacy Policy, Cookie Policy, this PAIA Manual	Website	www.sptsa.co.za, or on request at head office
Certificates issued by SPTsa	Verification of authenticity of a certificate, using the code printed on it	Website	www.sptsa.co.za/verify
Marketing material	Brochures and presentations	On request	Email admin@sptsa.co.za

6. Records available in terms of other legislation

SPTsa keeps records as required by, among others, the following laws:

Legislation	Records
Companies Act 71 of 2008	Memorandum of Incorporation, registers of directors and shareholders, minutes, annual financial statements
Income Tax Act 58 of 1962; Value-Added Tax Act 89 of 1991; Tax Administration Act 28 of 2011	Tax returns, VAT records, invoices, PAYE records
Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995	Employment contracts, time and remuneration records, leave records, disciplinary records
Employment Equity Act 55 of 1998	Employment equity records and reports
Skills Development Act 97 of 1998; Skills Development Levies Act 9 of 1999	Training records, levy returns
Unemployment Insurance Act 63 of 2001; Unemployment Insurance Contributions Act 4 of 2002	UIF declarations and contributions
Compensation for Occupational Injuries and Diseases Act 130 of 1993	Injury reports, annual returns
Occupational Health and Safety Act 85 of 1993	Health and safety records, incident registers, risk assessments
Main Agreement of the Metal and Engineering Industries Bargaining Council (MEIBC)	Registration and levy records, benefit fund submissions
Protection of Personal Information Act 4 of 2013	Information Officer appointment, consent records, privacy notices

7. Subjects on which SPTsa holds records

Subject	Categories of records
Company secretarial	Incorporation documents, statutory registers, resolutions, B-BBEE documents
Finance and tax	Accounting records, bank statements, invoices, budgets, tax and VAT records, audit reports
Human resources	Employee files, contracts, payroll, leave, training, medical certificates, CVs and job applications
Projects and operations	Quotations, contracts, work orders, project reports, certificates of completion, photographs
Health, safety and quality	Risk assessments, method statements, incident reports, inspection records, quality procedures
Clients	Client contact details, correspondence, contracts, vendor registration documents
Suppliers and subcontractors	Supplier details, purchase orders, quotes, subcontract agreements, due-diligence records
Information technology	Website, email and IT service records, access logs, backups
Insurance	Policies and claims

8. Processing of personal information

8.1 Purpose of processing

SPTsa processes personal information to: provide installation, refurbishment and maintenance services for marine, offshore and onshore accommodation; prepare quotes and perform contracts; recruit, employ and pay staff and contractors; arrange site and vessel access for personnel; manage suppliers and subcontractors; meet legal, tax, labour and health and safety obligations; operate and secure its website and IT systems; and answer enquiries.

8.2 Categories of data subjects and their personal information

Data subjects	Personal information processed
Employees and contractors	Names, ID or passport numbers, contact details, addresses, bank details, tax numbers, qualifications, training and medical fitness certificates, remuneration, leave and disciplinary records, next of kin
Job applicants	CVs, contact details, qualifications, work history, references
Client representatives	Names, job titles, business contact details, correspondence
Suppliers and subcontractors	Company and contact details, bank details, tax and B-BBEE information, representatives' names
Website visitors	IP address, browser and device data, pages visited, cookie choices, enquiries submitted

8.3 Recipients of personal information

Category of information	Recipients
Tax and payroll information	South African Revenue Service, external accountants and payroll provider
Employment and benefit information	Department of Employment and Labour (UIF, Compensation Fund), MEIBC and its benefit fund administrators
Personnel details needed for site access	Clients, vessel and facility operators, port authorities
Financial and banking details	SPTsa's bank, auditors, insurers
Group reporting, recruitment and project information	Société Phocéenne de Travaux group company (SPTmi), France
Information stored in IT systems	Hosting, email, cloud storage and website maintenance providers (including xneelo, Microsoft, Dropbox and Google)
Any category, where required by law	Courts, regulators and law-enforcement authorities

8.4 Planned transborder flows

Personal information is transferred outside the Republic:

- to SPTmi in France (group management, recruitment and projects), which is bound by the EU General Data Protection Regulation;
- to cloud service providers that may store data in the European Union or the United States (email, file storage, website statistics);
- to clients and facility operators in the countries where SPTsa personnel work on projects, limited to the information needed for site access.

These transfers take place only under the conditions of section 72 of POPIA: the recipient is subject to a law, binding corporate rules or an agreement giving adequate protection, or the data subject has consented, or the transfer is necessary for a contract.

8.5 Information security measures

- Access to personnel, financial and HR records restricted to authorised staff, with restricted folders for HR files.
- Password protection and two-factor authentication on administrator accounts for the website and hosting.
- Encrypted connection (https) on the website; firewall and malware scanning.
- Regular backups of the website and company files.
- Anti-virus software and updates on company computers.
- Confidentiality clauses with employees, and contractual obligations with service providers.

9. Availability of this manual

9.1 A copy of this manual is available:

- on the website, www.sptsa.co.za;
- at the head office, 51 Auckland Street, Paarden Eiland, Cape Town, for public inspection during normal business hours;
- to any person on request, on payment of a reasonable prescribed fee;
- to the Information Regulator on request.

9.2 A fee for a copy of this manual, as set out in Annexure B of the PAIA Regulations, is payable per A4-size photocopy made. Before processing a request for access to a record, SPTsa will require payment of any prescribed request fee, as provided in sections 22 and 54 of PAIA.

10. Updating of this manual

The head of SPTsa will update this manual whenever its information changes, and review it at least once a year.

Approved and issued by:
Eric Metois, Chief Executive Officer and sole director (head of the private body and default Information Officer), signed on 5 November 2026.

Nicole Conradie, Admin Manager (Deputy Information Officer, designated Information Officer), signed on 5 November 2026.

The signed original is kept at SPTsa's head office and is available for inspection on request.