



# **WinWin International**

**MANUAL PREPARED IN TERMS OF SECTION 51 OF  
THE PROMOTION OF ACCESS TO INFORMATION ACT (ACT 2 OF 2000)**

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## 1. INTRODUCTION

- 1.1. WinWin International ('**WWI**') is a blended learning and strategic communications specialist offering traditional, digital, immersive and multimedia solutions.
- 1.2. For purposes of this policy “we”, “us”, “our” refers to WWI, and “you”, “your”, “user” refers to the data subject.
- 1.3. WWI is committed to processing all personal information lawfully, transparently, securely, and in accordance with the Protection of Personal Information Act 4 of 2013 ('**POPIA**'), the European Union's General Data Protection Regulation 2016/679 ('**GDPR**'), and other relevant privacy legislation.
- 1.4. If you do not agree with this privacy policy, you are prohibited from using the website and must immediately refrain from doing so. Furthermore, if you do not agree with this privacy policy, or the terms of use, you should not provide any of your personal information to WWI.
- 1.5. This privacy policy sets out WWI's approach towards the use of your personal information. By submitting your personal information to us, and/or by using the website, you will be regarded as having given your consent – where necessary and appropriate – for the processing of personal information referred to in this policy. Consequently, by continuing to use the website, you acknowledge and agree that WWI may collect, use and transfer your personal information in accordance with this policy, and applicable legislation.

## **2. INFORMATION REQUIRED UNDER SECTION 51(1) (A) OF THE ACT**

- 2.1. Designated Head of WinWin International:  
Stuart Woolmington
- 2.2. Postal Address of WinWin International:  
PO Box 971, Magaliessig, 2067
- 2.3. Street Address of WinWin International:  
17 Poplar Avenue, Riverclub, Sandton, 2191
- 2.4. Tel. No of WinWin International:  
+27 11 514 0944
- 2.5. Fax. No of WinWin International:  
n/a
- 2.6. E- Mail address of WinWin International:  
[info@winwinza.com](mailto:info@winwinza.com)
- 2.7. Person delegated to deal with requests (for “the designated head”):  
Leon de Wet
- 2.8. E-mail address of the delegated designated head:  
leon@winwinza.com

## **3. DESCRIPTION OF GUIDE REFERRED TO IN SECTION 10**

A Guide has been compiled in terms of Section 10 of PAIA by the Information Regulator South Africa (IRSA). It contains information required by a person wishing to exercise any right, contemplated by PAIA. It is available in all of the official languages at <https://www.justice.gov.za/inforeg/docs.html> .

The Guide is available for inspection, *inter alia*, at the office of the

Information Regulator South Africa

JD House, 27 Stiemens Street  
Braamfontein, Johannesburg, 2001

P.O Box 31533

Braamfontein, Johannesburg, 2017

General enquiries email: [enquiries@inforegulator.org.za](mailto:enquiries@inforegulator.org.za).

#### **4. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION**

Records available in terms of other legislation are as follows:

- Basic Conditions of Employment Act No 75. Of 1997
- Broad-based Black Economic Empowerment Act 53 of 2003
- Companies Act No 71 of 2008 and Applicable Regulations
- Compensation for Occupational Injuries and Health Diseases Act No. 130 of 1993
- Competition Act No. 89 of 1998
- Consumer Affairs (Unfair Business Practice) Act No. 71 of 1988
- Consumer Protection Act 68 of 2008
- Copyright Act No. 98 of 1978
- Currency and Exchanges Act No .9 of 1933
- Debt Collector's Act No. 114 of 1998
- Electronic Communications Act, No. 36 of 2005;
- Electronic Communications and Transactions Act No 25 of 2002
- Employment Equity Act. No. 55 of 1998
- Income Tax Act No 58 of 1962
- Insolvency Act No. 24 of 1936
- Insurance Act No. 27 of 1943
- Intellectual Property Laws Amendment Act No. 38 of 1997

- Labour Relations Act No 66 of 1995
- National Health Act 61 of 2003
- National Credit Act No. 34 of 2005
- Occupational Health and Safety Act No. 85 of 1993
- Prevention and Combating of Corrupt Activities Act No 12 of 2004
- Prevention of Organised Crime Act No. 121 of 1998
- Promotion of Access to Information Act No.2 of 2000
- Promotion of Equality and Prevention of Unfair Discrimination Act No. 4 of 2000
- Protected Disclosures Act No. 26 of 2000
- Protection of Personal Information Act 4 of 2013
- Information Act No. 70 of 2002
- SA Reserve Bank Act No. 90 of 1989
- Skills Development Act 97 of 1998
- Skills Development Levies Act No 9 of 1999
- South African Reserve Bank Act No. 90 of 1989
- Trade Marks Act 194 of 1993
- Unemployment Insurance Act No. 63 of 2001
- Unemployment Insurance Contributions Act No 4 of 2002
- Value Added Tax Act No 89 of 1991

## **5. RECORDS AUTOMATICALLY AVAILABLE**

No notice has been submitted by the company to the Minister of Justice and Constitutional Development regarding the categories of records, which are available without a person having to request access in terms of Section 52(2) of PAIA. However, the information on the website of the business is automatically available without having to request access in terms of PAIA.

## **6. SUBJECTS AND CATEGORIES OF RECORDS HELD BY WINWIN**

General information about WinWin International can be accessed via the internet on [www.winwinza.com](http://www.winwinza.com), which is available to all persons who have access to the internet.

The subjects on which the private body holds records and the categories on each subject in terms of Section 51(1)(e), are as listed below. Please note that a requester is not automatically allowed access to these records and that access to them may be refused in accordance with Sections 62 to 69 of the Act:

### **6.1. Companies act records**

- All trust deeds;
- Documents of Incorporation;
- Memorandum of Incorporation;
- Minutes of meeting of the Board of Directors;
- Minutes of meetings of Shareholders;
- Proxy forms
- Register of directors' shareholdings;
- Research and development;
- Share certificates; and
- Share Register and other statutory registers and/or records and/or documents;
- Special resolutions/Resolutions passed at General and Class meetings.

Records relating to the appointment of:

- Auditors;
- Directors;
- Prescribed Officer.
- Public Officer; and

## **6.2. Financial records**

- Accounting Records
- Annual Financial Reports;
- Annual Financial Statements
- Asset Registers;
- Bank Statements
- Banking details and bank accounts;
- Banking Records
- Debtors / Creditors statements and invoices;
- General ledgers and subsidiary ledgers;
- General reconciliation;
- Invoices;
- Paid Cheques
- Policies and procedures;
- Rental Agreements; and
- Tax Returns.

## **6.3. Income tax records**

- PAYE Records
- Documents issued to employees for income tax purposes
- Records of payments made to SARS on behalf of employees
- All other statutory compliances:



- VAT
- Regional Services Levies
- Skills Development Levies
- UIF
- Workmen's Compensation

#### **6.4. Personnel documents and records**

- Accident books and records;
- Address Lists;
- Disciplinary Code and Records;
- Employee benefits arrangements rules and records;
- Employment Contracts;
- Employment Equity Plan
- Forms and Applications;
- Grievance Procedures;
- Leave Records;
- Medical Aid Records;
- Payroll reports/ Wage register;
- Pension Fund Records;
- Safety, Health and Environmental records;
- Salary Records;
- SETA records
- Standard letters and notices
- Training Manuals;
- Training Records;

## **6.5. Procurement department**

- Standard Terms and Conditions for supply of services and products;
- Contractor, client and supplier agreements;
- Lists of suppliers, products, services and distribution; and
- Policies and Procedures.

## **6.6. Sales department**

- Customer details
- Information and records provided by a third party

## **6.7. Marketing department**

- Advertising and promotional material

## **6.8. Risk Management and Audit**

- Audit reports;
- Risk management frameworks; and
- Risk management plans.

## **6.9. IT department**

- Computer / mobile device usage policy documentation;
- Disaster recovery plans;
- Hardware asset registers;
- Information security policies/standards/procedures;
- Information technology systems and user manuals

- Information usage policy documentation;
- Project implementation plans;
- Software licensing; and
- System documentation and manuals.

## **7. PURPOSE OF PROCESSING OF PERSONAL INFORMATION**

- To support sales and marketing activities
- To support recruitment and management of staff
- To support engagement with suppliers
- To support engagement with the general public
- To support engagement with investors and the media

## **8. DATA SUBJECTS CATEGORIES AND THEIR PERSONAL INFORMATION**

- Customers: record of customer life cycle
- Employees: record of employee life cycle
- Suppliers: record of supplier life cycle

## **9. PLANNED RECIPIENTS OF PERSONAL INFORMATION**

- Statutory authorities
- Law enforcement
- Tax authorities
- Financial institutions
- Medical schemes
- Employee pension and provident funds

- Industry bodies

## **10. PLANNED TRANS-BORDER FLOWS OF PERSONAL INFORMATION**

- Flows to service providers/operators
- Flows to business partners
- Flows to customers
- Flows to suppliers
- Flows through the use of social media

## **11. SECURITY MEASURES TO PROTECT PERSONAL INFORMATION**

- Physical security measures
- Cyber security measures
- Training in information security
- Policies in information security
- Audits of information security
- Any particular security framework implemented

## **12. DETAIL ON HOW TO MAKE A REQUEST FOR ACCESS**

The requester must complete Form 2 available at <https://www.justice.gov.za/inforeg/docs2-f.html> and submit this form together with a request fee, to the head of WinWin International. The form must be submitted to the head of WinWin International at his address, fax number, or electronic mail address as stated earlier in this manual.

## Form of request:

- The requester must use the prescribed form, as attached in terms of Article 8 of this manual, to make the request for access to a record. This must be made to the designated head. This request must be made to the address, fax number or electronic mail address of the body concerned [s 53(1)].
- The requester must provide sufficient detail on the request form to enable the designated head to identify the record and the requester.
- The requester should indicate which form of access is required.
- The requester should indicate if any other manner is to be used to inform the requester and state the necessary particulars to be so informed [s 53(2)(a) and (b) and (c)].
- The requester must identify the right that is sought to be exercised or to be protected and provide an explanation of why the requested record is required for the exercise or protection of that right [s 53(2)(d)].
- If a request is made on behalf of another person, the requester must then submit proof of the capacity in which the requester is making the request to the satisfaction of the designated head of the private body [s 53(2)(f)].
- A requester who seeks access to a record containing personal information about that requester is not required to pay the request fee.

- Every other requester, who is not a personal requester, must pay the required request fee.
- The designated head of the private body must notify the requester (other than a personal requester) by notice, requiring the requester to pay the prescribed fee (if any) before further processing the request [s 54(1)].
- The fee that the requester must pay to a private body is currently R50,00. The requester may lodge an application to the court against the tender or payment of the request fees 54(3)(b)].
- After the designated head of the private body has made a decision on the request, the requester must be notified in the required form.
- If the request is granted then a further access fee must be paid for the search, reproduction, preparation and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure [s 54(6)].

### **13. GROUNDS FOR REFUSING A REQUEST**

WinWin has the right to reject any request for information submitted in terms of Sections 62 to 70 of Chapter 4 of the PAIA Act.

## 14. AVAILABILITY OF THE MANUAL

This manual is available for inspection on <https://www.winwinza.com/>.



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**Signature of Designated Head of the Private Body**

Stuart Woolmington

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**Name of Designated Head of the Private Body**

**Date of signature** 2 June 2022

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**Next revision date of this document: 30/11/2022**

## 15. FEES IN RESPECT OF PRIVATE BODIES

The following is a breakdown of the fees structure for the purposes of determining the manner in which fees relating to a request for access to a record of a private body are to be calculated:

Part III of Regulation 187 published in the Government Gazette on the 15 February 2002:

1. The fee for a copy of the manual as contemplated in regulation 9(2)(c) is R1,10 for every photocopy of an A4-size page or part thereof.
2. The fees for reproduction referred to in regulation 11(1) are as follows:
  - a. (a) For every photocopy of an A4-size page or part thereof R1,10
  - b. (b) For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine readable form R0,75
  - c. (c) For a copy in a computer-readable form on - (i) stiffy disc R 7,50; (ii) compact disc R 70,00
  - d. (d) (i) For a transcription of visual images, for an A4-size page or part thereof R 40,00, (ii) For a copy of visual images R 60,00
  - e. (e) (i) For a transcription of an audio record, for an A4-size page or part thereof R 20,00; (ii) For a copy of an audio record R 30,00
3. The request fee payable by a requester, other than a personal requester, referred to in Regulation 11(2) is R50,00.
4. The access fees payable by a requester referred to in Regulation 11(3) are as follows:
  - a) For every photocopy of an A4-size page or part thereof R 1,10;



- b) For every printed copy of an A4-size page or part; thereof held on a computer or in electronic or machine-readable form R 0,75;
- c) For a copy in a computer-readable form on - (i) stiffy disc R 7,50; (ii) compact disc R 70,00
- d) (i) For a transcription of visual images, for an A4-size page or part thereof R 40,00; (ii) For a copy of visual images R 60,00
- e) (i) For a transcription of an audio record, for an A4-size page or part thereof R 20,00; (ii) For a copy of an audio record R 30,00
- f) To search for and prepare the record for disclosure, R30,00; for each hour or part of an hour reasonably required for such search and preparation.

1. For purposes of section 54(2) of the Act, the following applies:

- (a) Six hours as the hours to be exceeded before a deposit is payable; and
- (b) one third of the access fee is payable as a deposit by the requester.

2. The actual postage is payable when a copy of a record must be posted to a requester.

## **A. Fees**

*(a) A request for access to a record, other than a record containing personal information about yourself, will be processed only after a **request fee** has been paid.*

*(b) You will be notified of the amount required to be paid as the request fee.*

*(c) The **fee payable for access** to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.*

*(d) If you qualify for exemption of the payment of any fee, please state the reason for exemption.*

Reason for exemption from payment of fees:

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