

GCR SUPPLIERS (PTY) LTD

PAIA MANUAL

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

and incorporating the information required by section 51(1)(c) of PAIA and section 17 of the Protection of Personal Information Act 4 of 2013

Document control	Details
Entity	GCR Suppliers (Pty) Ltd
Company registration number	2020/186834/07
Information Regulator registration number	2026-065126
Date of compilation	25 August 2026
Effective date	26 August 2026
Review cycle	At least annually and whenever material information changes
Document owner	Gert Cornelis Rosslee, Information Officer
Approval	Approved by Gert Cornelis Rosslee, Information Officer
Version	1.1

APPROVAL STATUS

Approved by Gert Cornelis Rosslee, Information Officer, on 26 August 2026. Company and registration details were verified against Information Officer Registration Certificate 2026-065126.

Publication and annual review checklist

Use this checklist when publishing the approved manual and during each annual or material-change review.

- Confirm that the Information Officer email address and telephone number remain current.
- Confirm that the principal physical and postal addresses remain current.
- Confirm that the general PAIA email address and website remain current.
- Review whether a Deputy Information Officer should be appointed if operations or responsibilities materially expand.
- Confirm the record categories, applicable laws, cross-border transfers and security controls against actual operations.
- Publish the approved manual on the company website and keep a copy available at the principal place of business.
- Upload the approved manual through the Information Regulator eServices portal and retain proof of submission.
- Prepare at least one additional official-language version appropriate to the communities served, where reasonably required.

Table of contents

1. Acronyms and interpretation
 2. Purpose and scope
 3. Company and key contact details
 4. Guide on how to use PAIA
 5. Records automatically available
 6. Records available under other legislation
 7. Subjects and categories of records held
 8. Processing of personal information
 9. How to request access to a record
 10. Fees, decision periods and forms of access
 11. Grounds for refusal and severability
 12. Remedies and complaints
 13. Availability, approval and revision
- Annexure A: PAIA request handling checklist
- Annexure B: Current prescribed fee schedule
- Annexure C: Source and forms directory

1. Acronyms and interpretation

Term	Meaning
DIO	Deputy Information Officer
IO	Information Officer / head of the private body
PAIA	Promotion of Access to Information Act 2 of 2000, as amended
POPIA	Protection of Personal Information Act 4 of 2013
Regulator	Information Regulator (South Africa)
Republic	Republic of South Africa
Company	GCR Suppliers (Pty) Ltd

Words and expressions defined in PAIA or POPIA have the meanings given in those Acts. “Record” includes recorded information in any form or medium in the possession or under the control of the Company, whether or not created by the Company.

2. Purpose and scope

This Manual explains what records GCR Suppliers (Pty) Ltd holds, how a person may request access to them, and how the Company processes and safeguards personal information. It is intended to assist requesters to exercise or protect rights in accordance with PAIA and POPIA.

- identify records that may be available without a formal PAIA request;
- understand the subjects and categories of records held by the Company;
- obtain the contact details and procedure for lodging a request;
- understand applicable fees, decision periods, refusal grounds and remedies; and
- understand the Company’s processing of personal information, recipients, cross-border transfers and security safeguards.

Nothing in this Manual creates a right of access greater than the rights provided by law. Each request is assessed on its facts and may be granted, refused, deferred or partially granted in accordance with PAIA.

3. Company and key contact details

Item	Details
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Item	Details
Registered name	GCR Suppliers (Pty) Ltd
Company registration number	2020/186834/07
Information Regulator registration number	2026-065126 (registered 25 August 2026)
Nature of business	Supplier, procurement, software-platform and related commercial activities
Information Officer	Gert Cornelis Rosslee
IO appointment date	1 February 2020
Information Officer email	info@gcrsuppliers.co.za
Telephone	076 428 4249
Deputy Information Officer	None appointed
General PAIA email	info@gcrsuppliers.co.za
Physical / principal address	36B Gladstone Avenue, Geduld Extension, Springs, 1559
Postal address	36B Gladstone Avenue, Geduld Extension, Springs, 1559
Website	https://gcrsuppliers.co.za/msm/

Requests should be directed to the Information Officer at the physical, postal or email address above. A requester who cannot complete a written request may ask the Information Officer for reasonable assistance.

4. Guide on how to use PAIA

The Information Regulator has published a Guide in terms of section 10 of PAIA to assist persons who wish to exercise rights under PAIA and POPIA. The Guide describes the objects of the Acts, how to make requests, available assistance, remedies, fees, forms and relevant contact details. It is available in the official languages and in accessible formats from the Regulator.

Information Regulator	Current details
Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Telephone	010 023 5200 Toll-free 0800 017 160
General enquiries	enquiries@inforegulator.org.za
PAIA complaints	PAIAComplaints@inforegulator.org.za
Website	https://inforegulator.org.za
eServices	https://eservices.inforegulator.org.za

The Guide may be inspected at the Company's principal place of business during normal office hours once the address above is completed, or obtained from the Information Officer or the Regulator's website.

5. Records automatically available

The following records may be made available without a formal PAIA request, subject to identity verification, confidentiality, intellectual-property rights and any lawful restriction. Inclusion does not constitute a section 52 voluntary-disclosure notice unless formally submitted and published as such.

Category	Examples	How available
Public corporate information	Registered name, public registration information and business contact details	Company website, public registers or on request
Marketing and product information	Brochures, catalogues, product/service descriptions and public quotations	Website or on request, if created
Policies and notices	Published privacy notice, PAIA Manual and standard public terms	Website or on request

Category	Examples	How available
Recruitment	Public job advertisements	Relevant advertising channel while active
Public announcements	Public notices and communications approved for publication	Website or on request

6. Records available under other legislation

The Company keeps records as required by applicable law. The list below is indicative and applies only to the extent that the legislation governs the Company or the relevant activity.

Legislation	Typical records
Companies Act 71 of 2008	Memorandum of Incorporation, securities and director records, accounting records, annual returns and statutory registers
Income Tax Act 58 of 1962	Tax records, returns, assessments and supporting documents
Value-Added Tax Act 89 of 1991	VAT registrations, tax invoices, returns and supporting records, if registered
Tax Administration Act 28 of 2011	Taxpayer information, submissions, notices and supporting records
Basic Conditions of Employment Act 75 of 1997	Employment particulars, attendance, remuneration and leave records
Labour Relations Act 66 of 1995	Employment, disciplinary, grievance and labour-relations records
Employment Equity Act 55 of 1998	Employment equity plans, reports and workforce data, where applicable
Occupational Health and Safety Act 85 of 1993	Health and safety policies, risk records, incidents and training records
Compensation for Occupational Injuries and Diseases Act 130 of 1993	Registration, earnings, claims and incident records
Unemployment Insurance Act 63 of 2001 and Contributions Act 4 of 2002	UIF registration, declarations, contributions and employee information

Legislation	Typical records
Skills Development Act 97 of 1998 and Levies Act 9 of 1999	Skills plans, training and levy records, where applicable
National Credit Act 34 of 2005	Credit agreements and affordability or credit records, where applicable
Consumer Protection Act 68 of 2008	Customer terms, complaints, warranties, product and service information
Electronic Communications and Transactions Act 25 of 2002	Electronic communications, transactions and website records
POPIA 4 of 2013	Personal-information processing records, notices, authorisations, incidents and data-subject requests
PAIA 2 of 2000	This Manual, requests, decisions, correspondence and annual reporting records
Broad-Based Black Economic Empowerment Act 53 of 2003	Verification and supporting transformation records, where applicable
Customs and Excise Act 91 of 1964	Import/export and customs records, where applicable

7. Subjects and categories of records held

Subject	Categories of records
Corporate and governance	Incorporation records; director and shareholder records; resolutions; policies; licences; insurance; compliance records; delegations and statutory filings
Finance and tax	Budgets; management accounts; annual financial statements; bank records; invoices; payments; debtors and creditors; assets; audit records; tax records
Customers and sales	Customer records; enquiries; quotations; orders; agreements; pricing; delivery records; correspondence; complaints; returns and warranties
Suppliers and procurement	Supplier onboarding; due diligence; quotations; purchase orders; agreements; credentials; performance; invoices; payment and correspondence records
Products, services and operations	Catalogues; specifications; stock and inventory; quality records; logistics; delivery; service records; operating procedures and incident records
Human resources	Recruitment; employee and contractor files; contracts; payroll; benefits; performance; leave; discipline; grievances; training; health and safety
Information technology	Hardware and software registers; access logs; backups; security; support; licences; system records and communications metadata
Legal, risk and compliance	Contracts; disputes; claims; legal advice; risk assessments; regulatory correspondence; PAIA/POPIA records and investigations
Marketing and communications	Brand materials; campaigns; websites; social media; mailing lists; photographs; events and public communications
Property and facilities	Leases; access control; CCTV where used; maintenance; utilities; visitors; security and incident records

The fact that a category is listed does not mean that every record exists, is retained indefinitely, or will be disclosed. Retention and disposal are governed by operational need, legal duties and the Company's retention practices.

8. Processing of personal information

8.1 Purposes of processing

- operating and administering the business;

- supplying and procuring goods or services;
- onboarding, managing and communicating with customers, suppliers and contractors;
- recruitment, employment, payroll, benefits, training, health and safety;
- financial management, payments, credit control, tax and audits;
- legal and regulatory compliance, fraud prevention, risk and security;
- marketing and business development where lawful;
- information technology, access control, continuity and incident response; and
- handling enquiries, complaints, PAIA requests and data-subject requests.

8.2 Categories of data subjects and information

Data subjects	Personal information commonly processed
Customers, prospects and representatives	Identity and contact details; role; communications; orders; contracts; delivery; payment; credit and complaint information
Suppliers, service providers and representatives	Identity and contact details; company and verification information; banking and tax details; quotations; contracts; performance and correspondence
Employees, applicants and contractors	Identity, contact, demographic and next-of-kin details; qualifications; employment history; references; tax, payroll and bank details; performance, leave, health and safety information; background checks where lawful
Directors, shareholders and officers	Identity, contact, ownership, governance, financial and statutory information
Visitors and facility users	Contact details; visitor records; access-control data; vehicle information; CCTV images where applicable
Website and electronic users	Device, log, cookie, usage, enquiry and communication information, where applicable
Complainants, requesters and third parties	Identity, contact, request, supporting evidence, correspondence and outcome information

8.3 Recipients or categories of recipients

Personal information may be supplied, where lawful and necessary, to banks and payment providers; auditors and professional advisers; payroll, benefits and HR providers; insurers; technology, hosting, security and support providers; logistics and delivery providers; customers and suppliers involved in a transaction; credit bureaus and fraud-prevention services; regulators, law-enforcement bodies, courts and other public authorities; and parties to a corporate transaction. Service providers are required to process information under appropriate contractual and security controls.

8.4 Planned cross-border flows

The Company has confirmed that it does not knowingly conduct routine cross-border processing of personal information. Before any future cloud, communications, software, support or logistics provider processes personal information outside South Africa, the Company will assess and document the transfer and ensure compliance with section 72 of POPIA through adequate protection, binding agreements, consent or another lawful basis.

8.5 Security safeguards

The Company applies reasonable technical and organisational measures appropriate to the risks, including role-based access; password and authentication controls; endpoint and network protection; secure backups; physical access controls; confidentiality duties; supplier due diligence and contractual safeguards; staff awareness; incident response; secure disposal; and periodic review. For the Martoza service, verified controls include role-based access, authentication controls, HTTPS, restricted browser origins, audit logging, encrypted checksum-verified backups, a tested restore process, controlled retention, and a documented incident workflow.

9. How to request access to a record

1. Identify the record with enough detail for the Company to locate it and identify the right that the record is required to exercise or protect.
2. Complete prescribed Form 2 (Request for Access to Record). Attach proof of identity and, if acting for another person, proof of authority.
3. Select the required form and manner of access and provide contact details for notices.
4. Submit Form 2 to the Information Officer using the contact details in section 3. Keep a copy and proof of delivery.
5. Pay the prescribed request fee when notified, unless an exemption applies. Further access, search, preparation, reproduction or deposit fees may be required.
6. The Company will decide the request within 30 days after receipt, unless PAIA permits an extension of up to a further 30 days. The requester will receive written reasons and information on remedies.

A record of a private body must be required for the exercise or protection of a right, the procedural requirements must be met, and no ground of refusal may apply. Requests for a data subject's own personal information may also be made under section 23 of POPIA and are not subject to a fee under POPIA.

10. Fees, decision periods and forms of access

The prescribed fees are set by regulation and may change. The current fee schedule at the date of this Manual appears in Annexure B. The Company may require a deposit where permitted if the search and preparation is expected to exceed six hours. No access fee is charged to inspect a record, although the request fee may still apply.

Access may be provided by inspection, printed copy, transcription, electronic copy, email, secure file transfer, cloud share, courier or another lawful and reasonably practicable method. Access may be deferred if the record is to be published within 90 days or another permitted period.

11. Grounds for refusal and severability

Access must or may be refused where PAIA requires or permits, including to protect:

- the privacy of a third party who is a natural person;
- commercial information of the Company or a third party;
- confidential information supplied by a third party;
- the safety of individuals and security of property;
- legally privileged records;
- research information; and
- records whose disclosure would breach a duty of confidence or another law.

PAIA also contains mandatory disclosure overrides where disclosure would reveal evidence of a substantial contravention of law or imminent and serious public safety or environmental risk and the public interest in disclosure clearly outweighs the harm. Where only part of a record is protected, the Company will disclose any reasonably severable remainder.

12. Remedies and complaints

There is no internal appeal against a decision of a private body. A requester or affected third party may lodge a written complaint with the Information Regulator on prescribed Form 5 after the Company has had an opportunity to respond, or may approach a competent court as permitted by PAIA. A complaint generally must be lodged within 180 days of the decision, deemed refusal or other conduct complained of, subject to any extension allowed by the Regulator.

Route	Details
Information Regulator complaint	Form 5 PAIAComplaints@infoeregulator.org.za https://infoeregulator.org.za/paia-form-5/
Court application	A competent court under PAIA; obtain legal advice on time limits and procedure
Company reconsideration	The requester may first ask the Information Officer to clarify or reconsider, without prejudicing statutory remedies

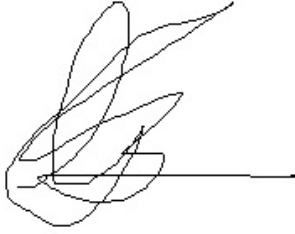
13. Availability, approval and revision

Once approved, this Manual will be available:

- on the Company website, if any;
- at the Company's principal place of business for public inspection during normal business hours;
- to any person on request, subject to a reasonable reproduction charge; and
- to the Information Regulator on request and through the applicable eServices submission process.

The Information Officer must review this Manual at least annually and promptly after changes to contact details, record categories, processing activities, recipients, cross-border transfers, security measures, legislation or regulatory guidance.

Approval	Details
Approved by	Gert Cornelis Rosslee
Capacity	Information Officer

Approval	Details
Information Officer appointment date	1 February 2020
Information Regulator registration	Certificate 2026-065126, registered 25 August 2026
Signature	
Date	26 August 2026
Next scheduled review	26 August 2027 or earlier after material change

Annexure A: PAIA request handling checklist

- ☐ Date-stamp and register the request; acknowledge receipt.
- ☐ Verify prescribed Form 2, identity and authority. Assist the requester if necessary.
- ☐ Clarify the record and right to be exercised or protected.
- ☐ Issue the request-fee notice where applicable and pause processing until paid.
- ☐ Search all reasonable locations; preserve relevant records.
- ☐ Identify third-party interests and follow PAIA notice/representation procedures.
- ☐ Assess grounds for refusal, public-interest override and severability.
- ☐ Calculate any access fee or lawful deposit and issue prescribed Form 3.
- ☐ Communicate the decision within 30 days or issue a lawful extension notice before the deadline.
- ☐ Provide access in the requested form where reasonably practicable.
- ☐ Give adequate reasons, statutory provisions and complaint/court remedy information if access is refused or limited.
- ☐ Retain the request, proof, correspondence, search record, decision and disclosure record; include it in annual reporting statistics.

Annexure B: Prescribed fee schedule (private bodies)

Current as at 25 August 2026. Confirm the latest official fee schedule before issuing a fee notice.

Item	Amount
Request fee payable by a requester (subject to exemptions)	R140.00
A4 black-and-white photocopy or printed copy	R2.00 per page or part thereof
Printed copy of an A4 page	R2.00 per page or part thereof
Computer-readable copy on requester-provided flash drive	R40.00
Computer-readable copy on requester-provided CD	R40.00
Computer-readable copy on CD supplied by the Company	R60.00
Transcription or copy of visual images	Actual outsourced service-provider quotation

Item	Amount
Transcription of audio record	R24.00 per A4 page or part thereof
Audio copy on requester-provided flash drive	R40.00
Audio copy on requester-provided CD	R40.00
Audio copy on CD supplied by the Company	R60.00
Search and preparation after the first six hours	R145.00 per hour or part thereof
Deposit where search/preparation exceeds six hours	One-third of the estimated amount
Postage, email or other electronic transfer	Actual expense, if any

Fee exemptions include a personal requester seeking access to a record containing their own personal information, and any other exemption or threshold prescribed by regulation. The Company must not charge a fee other than one authorised by PAIA and the Regulations.

Annexure C: Official sources and forms directory

Resource	Official location
PAIA and private-body manual requirements	https://www.justice.gov.za/legislation/acts/2000-002.pdf
Information Regulator PAIA guidance and templates	https://infoeregulator.org.za/paia-guidelines/
PAIA forms, including Form 2, Form 3 and Form 5	https://infoeregulator.org.za/paia-forms/
Form 2: Request for Access to Record	https://infoeregulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf
Form 5: Complaint	https://infoeregulator.org.za/paia-form-5/

Resource	Official location
PAIA fee structure	https://inforegulator.org.za/paia-fees/ (or the latest fee notice on the Regulator website)
Information Regulator eServices	https://eservices.inforegulator.org.za

Company verification source: Information Officer Registration Certificate 2026-065126, issued by the Information Regulator on 25 August 2026. It confirms company registration number 2020/186834/07 and Gert Cornelis Rosslee as Information Officer with appointment date 1 February 2020.

Legal status note: This Manual is a compliance document, not legal advice. GCR Suppliers (Pty) Ltd should obtain professional review if its operations include regulated products, credit, health information, large-scale monitoring, cross-border processing or other sector-specific risks.