

# PAIA MANUAL

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

**DATE OF COMPILATION: 26 May 2026**

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## 1. Definitions

In this PAIA Manual, unless the context clearly indicates otherwise:

- 1.1. Data Subject means the person to whom Personal Information relates;
- 1.2. Customer means any natural or juristic person which receives or has received goods or services from GMP;
- 1.3. GMP means Genet Mineral Processing (Pty) Ltd, a private company incorporated under registration number 2001/025568/07;
- 1.4. Information Officer means the Information Officer of GMP, described in paragraph 4 of this PAIA Manual;
- 1.5. PAIA Manual means this PAIA Manual of GMP;
- 1.6. PAIA means the Promotion of Access to Information Act, 2 of 2000, as amended;
- 1.7. Personal Information means any information that identifies a Customer and/or Data Subject or specifically relates to a Customer and/or Data Subject, including but not limited to:
- 1.7.1. race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the Customer and/or Data Subject;
  - 1.7.2. information relating to the education or the medical, financial, criminal or employment history of the Customer and/or Data Subject;

- 1.7.3. any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the Customer and/or Data Subject;
- 1.7.4. the biometric information of the Customer and/or Data Subject;
- 1.7.5. the personal opinions, views or preferences of the Customer and/or Data Subject;
- 1.7.6. correspondence sent by the Customer and/or Data Subject that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- 1.7.7. the views or opinions of another individual about the Customer and/or Data Subject; and
- 1.7.8. the name of the Customer and/or Data Subject if it appears with other personal information relating to the Customer and/or Data Subject or if the disclosure of the name itself would reveal information about the Customer and/or Data Subject.

1.8. POPIA means the Protection of Personal Information Act, 4 of 2013;

1.9. Records means any recorded information, including but not limited to:

1.9.1. regardless of form or medium, including any of the following:

1.9.1.1. writing on any material;

1.9.1.2. information produced, recorded or stored by means of any tape-recorder, computer equipment, whether hardware or software or both, or other device, and any material subsequently derived from information so produced, recorded or stored;

1.9.1.3. label, marking or other writing that identifies or describes any thing of which it forms part, or to which it is attached by any means;

1.9.1.4. book, map, plan, graph or drawing;

1.9.1.5. photograph, film, negative, tape or other device in which one or more visual images are embodied so as to be capable, with or without the aid of some other equipment, of being reproduced;

1.9.2. in the possession or under the control of a responsible party;

1.9.3. whether or not it was created by a responsible party; and

1.9.4. regardless of when it came into existence;

1.10. Regulator

means the Information Regulator established in terms of section 39 of POPIA.

2. Interpretation

- 2.1. The headings to the clauses of this PAIA Manual are inserted for reference purposes only and shall in no way govern or affect the interpretation hereof.
- 2.2. Words importing the singular shall include the plural and vice versa. Words importing persons shall include legal persons and vice versa. Words importing any gender shall include the other gender.

3. Introduction

- 3.1. GMP is obliged to compile a PAIA Manual in terms of section 51 of PAIA and to address the requirements set out in POPIA.
- 3.2. This PAIA Manual sets out, *inter alia*:
  - 3.2.1. the categories of Records held by GMP which are available without a person having to submit a formal PAIA request;
  - 3.2.2. the procedure to request access to Records of and held by GMP;
  - 3.2.3. the contact details of the Information Officer who will assist the public with the Records they require access to;
  - 3.2.4. the purpose of processing of Personal Information and the description of the categories of Data Subjects and of the information relating thereto;
  - 3.2.5. the security measures implemented to ensure the confidentiality, integrity and availability of the Personal Information which is to be lawfully processed.

4. Contact Details

4.1. Information Officer

Name: Annalize Catherine Bekker

Designation: Group Financial Controller

Telephone Number: 076 083 6793

Email: [annalize.bekker@genet.co.za](mailto:annalize.bekker@genet.co.za)

#### 4.2. GMP

Postal Address: PO Box 12716, Leraatsfontein, eMalahleni, 1038

Physical Address: Genet House, Wilge Power Station, Voltargo, Ogies,  
Mpumalanga, 2226

Telephone Number: 013 590 0880

Email Address: [info@genet.co.za](mailto:info@genet.co.za)

#### 5. PAIA Guide

- 5.1. The Regulator has, in terms of section 10(1) of PAIA, published a guide on how to use and access information in terms of PAIA.
- 5.2. The aforesaid guide contains the description of, *inter alia*:
  - 5.2.1. the objects of PAIA and POPIA;
  - 5.2.2. the categories of Information Officers for public and private bodies;
  - 5.2.3. the manner and form of a request for access to the records held by public and private bodies;
  - 5.2.4. the assistance available from the Regulator in terms of PAIA and POPIA; and
  - 5.2.5. legal remedies available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA.
- 5.3. The guide is available upon request to the Information Officer in the office of the Regulator from the website <https://info regulator.org.za/>.

6. Notice in terms of Section 52 of PAIA

No notice has been published in terms of section 52 of PAIA.

7. Records available upon request

7.1. GMP holds and processes certain Records for the purposes of PAIA and POPIA.

7.2. GMP shall keep Records and we may make these Records available for inspection to a requester if:

7.2.1. the requester is entitled to such access in terms of PAIA or POPIA and such access is not prohibited by any other applicable law, codes of conduct, rules or regulations; and

7.2.2. a request for access to such information is made in terms of PAIA.

8. Requesting of Information

To facilitate the processing of your request, kindly:

8.1. use the prescribed form, available on the Regulator's website at <https://info regulator.org.za/>;

8.2. address your request to the Information Officer;

8.3. provide sufficient details to enable GMP to identify:

8.3.1. the Record(s) requested;

8.3.2. the requester (and if an agent is lodging the request, proof of authority);

8.4. indicate the form of access required;

8.5. specify the requester's email address, postal address or fax number in South Africa;

- 8.6. if, in addition to a written reply, the requester wishes to be informed of GMP's decision about the request in any other manner, please advise the manner and particulars thereof; and
- 8.7. identify the right which the requester is seeking to exercise or protect including an explanation of the reason why the Record is required for the exercise or protection of the right.
9. Records held in terms of other legislation

GMP holds records in terms of legislation other than PAIA, including but not limited to:

| Ref:        | Act:  |
|-------------|---|
| 95 of 1967  | Income Tax Act  |
| 28 of 2011  | Tax Administration Act                                  |
| 28 of 2002  | Mineral and Petroleum Resources Development Act         |
| 89 of 1991  | Value Added Tax Act                                     |
| 9 of 1933   | Currency and Exchanges Act                              |
| 66 of 1995  | Labour Relations Act                                    |
| 75 of 1997  | Basic Conditions of Employment Act                      |
| 55 of 1998  | Employment Equity Act                                   |
| 97 of 1998  | Skills Development Act                                  |
| 130 of 1993 | Compensation for Occupational Injuries and Diseases Act |
| 30 of 1996  | Unemployment Insurance Act                              |
| 85 of 1993  | Occupational Health and Safety Act                      |
| 25 of 2002  | Electronic Communications and Transactions Act          |
| 38 of 2001  | Financial Intelligence Centre Act                       |
| 4 of 2013   | Protection of Personal Information Act                  |

10. Subjects on which Records are kept

10.1. Section 51(1)(b)(iv) of PAIA states that GMP is to keep a description of the subjects on which it holds Records.

10.2. The subjects on and categories of Records kept are:

- 10.2.1. Records relating to our goods and services;
- 10.2.2. documents prepared such as contracts, indemnity and waiver forms, POPI consents and related correspondence;
- 10.2.3. asset registers and other records relating to our assets;
- 10.2.4. software licences;
- 10.2.5. Records of and relating to our Customers and potential Customers including Personal Information, orders, and correspondence;
- 10.2.6. Records relating to our suppliers and potential suppliers including quotes, proposals, contracts, vendor forms;
- 10.2.7. invoices and correspondence;
- 10.2.8. financial and tax records including audited and other annual financial statements, management accounts, tax returns;
- 10.2.9. compliance records including records obtained in terms of the Financial Intelligence Centre Act, 2001;
- 10.2.10. correspondence with regulators and others relating to compliance;
- 10.2.11. records relating to our employees, their dependants and beneficiaries and job applicants including recruitment records, employment contracts, payroll records, records relating to employment benefits, disciplinary and performance records, training and assessment records, occupational health and safety, unemployment insurance and skills development records;
- 10.2.12. documents relating to assessment of risk and insurance cover.

## 11. Information required to be included in PAIA Manual

- 11.1. Section 51(1)(c) of PAIA sets out the description of the information required to be included in this PAIA Manual.

11.2. Please see our privacy policy (available on our website at [www.genet.co.za](http://www.genet.co.za) or on request to [annalize.bekker@genet.co.za](mailto:annalize.bekker@genet.co.za)) which describes:

11.2.1. what Personal Information or categories of Personal Information we process;

11.2.2. the purposes for which we process that Personal Information;

11.2.3. the categories of Data Subjects whose Personal Information we process;

11.2.4. the recipients or categories of recipients to whom the Personal Information may be supplied;

11.2.5. planned transborder flows of Personal Information;

11.2.6. a general description of the information security measures we implement as a responsible party to ensure the confidentiality, integrity and availability of the Personal Information we process.

## 12. Prescribed Fees

12.1. A requester must pay the prescribed fees before a request will be processed.

12.2. A requestor may lodge a complaint with the Regulator or an application with a court against the tender or payment of the request fee in terms of section 54(1) of PAIA or the tender or payment of a deposit in terms of section 54(2) of PAIA.

12.3. Records may be withheld until the prescribed fees have been paid.

12.4. The prescribed fees are available on the website of the Regulator at <https://info regulator.org.za/>.

## 13. PAIA Manual

13.1. GMP will update this PAIA Manual from time to time.

13.2. This PAIA Manual is available:

13.2.1. on GMP's website at [www.genet.co.za](http://www.genet.co.za);

13.2.2. at GMP's principal place of business, specified in paragraph 4 above;

13.2.3. to any person upon request and payment of a reasonable amount;

13.2.4. to the Regulator on request.

14. Collection and Processing of Personal Information

14.1. GMP collects Personal Information about Customers and/or Data Subjects from the following sources:

14.1.1. Personal Information collected directly from Customers and/or Data Subjects;

14.1.2. Personal Information collected from public records;

14.1.3. Personal Information collected from a public domain, where the Customers and/or Data Subjects have disclosed the Personal Information;

14.1.4. Personal Information collected based on the Customers and/or Data Subjects use of GMP's goods and/or services;

14.1.5. Personal Information based on how Customers and/or Data Subjects engage or interact with GMP via emails, letters and telephone calls;

14.1.6. Personal Information collected from third parties; and

14.1.7. Personal Information collected from any other source with the written consent of the Customers and/or Data Subjects.

14.2. If required by law, the necessary consent will be obtained before the collection of any Personal Information from third parties.

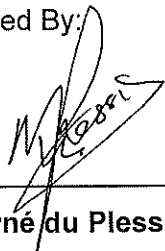
14.3. Personal Information will be collected, to:

14.3.1. provide Customers with goods and services;

14.3.2. market our goods and services to Customers;

- 14.3.3. respond to enquires and/or complaints;
  - 14.3.4. comply with legislative, regulatory, risk and compliance requirements (including directives, sanctions and rules), codes of conduct and industry agreements or to fulfil reporting requirements and information requests;
  - 14.3.5. enter into contracts and to satisfy any obligations as per GMP's contracts;
  - 14.3.6. process payment instruments;
  - 14.3.7. provide security and identity verification, as well as to check the accuracy of information; and/or
  - 14.3.8. pursue and protect the Customer's interests or the interest of a third party with whom the Personal Information is being shared.
- 14.4. GMP undertakes to process the Personal Information lawfully and in a reasonable manner, so as not to infringe on Customers' and/or Data Subjects' privacy. The Personal Information collected will only be processed for the aforesaid purposes.

Issued By:



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**Morné du Plessis**

**Chief Executive Officer**