



PROMOTION OF ACCESS TO INFORMATION ACT MANUAL

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1. WHO ARE WE

Beck Family Estates (Pty) Ltd t/a Steenberg ("Steenberg") is a family-owned producer and seller of premium wines.

Business name: Beck Family Estates (Pty) Ltd, a private company with limited liability registered in South Africa with registration number 2000/024662/07

Registered address: Graham Beck, R60 Road, Robertson, Western Cape, 6705

Directors: Antony Rowland Beck, Johannes Hermanus Mostert, Emma Rebecca Beck, David Scott Burford, Kenneth Spencer Clan

Phone number: +27 21 874 1258

Websites: www.steenbergfarm.com

Email address: privacy@steenbergfarm.com

2. ABOUT THIS MANUAL

We respect your right of access to information. This manual will help you to exercise the right to get access to some of our records when the record is required to exercise or protect your rights, you have followed the procedures, and we do not have any reason to refuse your request.

This manual has been made available in compliance with Section 51 of the Promotion to Access of Information Act 2 of 2000 (generally referred to as “PAIA”). Visit www.access-to-information.co.za to read PAIA.

This manual is available on our website, or a hard copy can be obtained at our premises. We may update this manual occasionally.

3. HOW THIS MANUAL HELPS YOU

- ⇒ This PAIA Manual is useful for the public to check the categories of records held by Steenberg that are available without a person having to submit a formal PAIA request.
- ⇒ It helps the public have a sufficient understanding of how to request access to a record of Steenberg by providing a description of the subjects on which we hold records and the categories of records held on each subject.
- ⇒ It enables the public to know the description of the records of Steenberg, which are available by any other legislation.
- ⇒ It provides access to all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access.
- ⇒ It helps the public know the description of the guide on how to use PAIA, as updated by the Regulator, and how to obtain access to it.
- ⇒ It allows the public to know if we will process personal information, the purpose of processing personal information, and the description of the categories of data subjects and the information or categories of information applicable.
- ⇒ It informs the public of the description of the categories of data subjects and the information or categories of information applicable.
- ⇒ It enables the public to know the recipients or categories of recipients to whom the personal information may be supplied.



- ⇒ It allows the public to know if we have 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.
- ⇒ It ensures the public knows whether we have appropriate security measures to ensure the confidentiality, integrity and availability of the personal information to be processed.

4. WHO YOU CAN CONTACT FOR ASSISTANCE

If you need to access our information or records, you can contact our Information Officer:

Name:	Herman Mostert
Address:	Black River Park North Block D, Ground Floor, 2 Fir Street, Observatory, Cape Town, 7935
Phone number:	021 874 1258
Email address:	Herman@beckfamilyestates.co.za

5. FURTHER GUIDANCE FROM THE INFORMATION REGULATOR

The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA in an easily understandable form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

The Guide is available in each of the official languages and in braille.

The Guide contains a description of the objects of PAIA and POPIA. It includes the postal and street addresses, phone numbers, and, where available, the email addresses of the Information Officer of every public body, and every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA.

It explains the manner and form of a request for access to a record of a public body contemplated in section 113, as well as access to a record of a private body contemplated in section 50.

The Guide details the assistance available from the Information Officer of a public body in terms of PAIA and POPIA, as well as the assistance available from the Regulator in terms of both Acts.

It outlines all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging an internal appeal, a complaint to the Regulator, or an application with a court against a decision by the Information Officer of a public body, a decision on internal appeal, a decision by the Regulator, or a decision of the head of a private body.



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

If you require additional guidance regarding PAIA and exercising your rights, you can contact the Information Regulator or read the Information Regulator's PAIA guide in each official language at: <https://www.justice.gov.za/infoereg/docs.html>.

The Information Regulator's details:

Website:	www.inforegulator.org.za
Postal address:	PO Box 3153, Braamfontein, Johannesburg, 2017
Physical address:	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Phone number:	010 023 5200
Lodge a complaint:	paiacomplaints@inforegulator.co.za
General Enquiries:	enquiries@inforegulator.org.za

6. RECORDS WE MAKE AVAILABLE AUTOMATICALLY

These are records that we make available automatically without you needing to request access to them in terms of PAIA.

Records:	Access:
Directors' names	www.bizportal.gov.za
Other incorporation documents	www.bizportal.gov.za
Banking details	Request via e-mail
Information on our websites (including our products and prices)	www.steenbergfarm.com & www.steenbergfarm.com
PAIA Manual	www.steenbergfarm.com
Website privacy policy	www.steenbergfarm.com
Website terms and conditions	www.steenbergfarm.com

7. RECORDS WE REQUIRE TO DO OUR BUSINESS

We hold certain categories of records in electronic or physical format. We do not make these records available automatically. You may request access to these documents in terms of PAIA:

Categories:	Description of categories:
Statutory records	⇒ Company incorporation documents ⇒ Share register ⇒ Memorandum of Incorporation ⇒ Resolutions ⇒ Minutes of meetings of the board of directors ⇒ Records relating to the appointment of directors, auditors, and other officers
Income tax	⇒ Pay-as-you-earn (PAYE) records Documents issued to employees for income tax purposes ⇒ Records of payments made to South African Revenue Services on behalf of employees ⇒ Tax returns ⇒ All or any statutory compliance ⇒ Value Added Tax ⇒ Skills Development Levy documents ⇒ Unemployment Insurance Fund
Labour relations records	⇒ COIDA documents and records ⇒ Personnel documents and records ⇒ Employment contracts ⇒ Disciplinary records ⇒ Salary records ⇒ Disciplinary code and/or procedures ⇒ Leave records ⇒ Training records ⇒ Training manuals ⇒ Address lists ⇒ Internal telephone lists
Finance	⇒ Receipts and payments ⇒ Bank statements ⇒ A list of the company's debtors and creditors ⇒ Budgets



	⇒ Management accounts ⇒ Asset registers ⇒ Invoices ⇒ Salaries ⇒ Minutes of meetings ⇒ Correspondence
Risk and compliance	⇒ Contracts ⇒ Policies and procedures ⇒ Risk assessment ⇒ Compliance records ⇒ Insurance policies ⇒ POPIA compliance documents
Other	⇒ IT usage statistics and equipment details ⇒ Supplier lists ⇒ Secretarial records ⇒ Media releases and public relation events records
Customer information	⇒ Customer details ⇒ Contact details of existing and prospective customers ⇒ Communication and correspondence with customers ⇒ Sales records ⇒ Transactional information and marketing records

8. RECORDS WE ARE REQUIRED TO HOLD BY LAW

We keep certain legislative records that we are required to keep by law. You can request that we provide you with these records. We keep the following legislative records:

Records:	Access:
Communications and IT	⇒ Electronic Communications Act 36 of 2005 ⇒ Electronic Communications and Transactions Act 25 of 2002 ⇒ Regulation of Interception of



	Communications and Provision of Communication related Information Act 70 of 2002 ⇒ Cybercrimes Act 19 of 2020
Compliance and Corporate Governance	⇒ Companies Act 71 of 2008
Copyright, Intellectual Property and Trademarks	⇒ Copyright Act 98 of 1978 ⇒ Intellectual Property Laws Amendment Act 38 of 1997 ⇒ Intellectual Property Laws Amendment Act 28 of 2013 ⇒ Trade Marks Act 194 of 1993
Finance	⇒ Income Tax Act 58 of 1962 ⇒ Insolvency Act 24 of 1936 ⇒ Tax Administration Act 28 of 2011 ⇒ Value Added Tax Act 89 of 1991
General	⇒ Consumer Protection Act 68 of 2008 ⇒ Prescription Act 18 of 1943 ⇒ Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000 ⇒ Promotion of Access to Information Act, No 2 of 2000 ⇒ Protection of Personal Information Act 4 of 2013 ⇒ Liquor Act 59 of 2003 ⇒ Liquor Products Act 60 of 1989
Human Resources	⇒ Basic Conditions of Employment Act 75 of 1997 ⇒ Compensation for Occupational Injuries and Disease Act 130 of 1993 ⇒ Employment Equity Act 55 of 1998 ⇒ Labour Relations Act 66 of 1995 ⇒ Occupational Health and Safety Act 85 of 1993



	⇒ Protected Disclosures Act 26 of 2000 ⇒ Skills Development Act 97 of 1998 ⇒ Skills Development Levies Act 9 of 1999 ⇒ Unemployment Insurance Act 63 of 2001 ⇒ Unemployment Insurance Contributions Act 4 of 2002
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9. PROCESSING OF PERSONAL INFORMATION:

Categories of people:

We process the personal information of the following categories of people:

- ⇒ customers or organisations
- ⇒ prospects or leads
- ⇒ employees
- ⇒ recruiters
- ⇒ contractors
- ⇒ vendors
- ⇒ suppliers
- ⇒ debtors and creditors
- ⇒ directors and shareholders

Purposes:

We process the personal information to:

- ⇒ provide our goods or supply our services
- ⇒ better understand our data subjects' needs when doing so
- ⇒ keep our data subject records up to date
- ⇒ manage employees
- ⇒ manage supplier contracts
- ⇒ manage customer relationships



- ⇒ manage customer credit
- ⇒ enforce debts
- ⇒ market goods and services to current and prospective customers in various countries
- ⇒ run promotional competitions
- ⇒ promote our wine clubs
- ⇒ communicate with customers and wine club members
- ⇒ process customer requests or complaints

Categories of personal information:

We process many different categories of personal information, including:

- ⇒ contact details, such as phone numbers, physical and postal addresses, and email addresses
- ⇒ personal details, such as names and ages
- ⇒ demographic details, such as races and age groups
- ⇒ health information
- ⇒ biometric information
- ⇒ account numbers
- ⇒ background information
- ⇒ contract information
- ⇒ credit information
- ⇒ market intelligence information
- ⇒ debt and debtor information

Third-party disclosures:

We give the following people personal information that we process in the ordinary course of business to fulfil our obligations to our customers:

- ⇒ contractors, vendors, or suppliers
- ⇒ agents, distributors, or other resellers



- ⇒ operators, other responsible parties, or co-responsible parties
- ⇒ third-party vendors (such as software developers) to help us maintain our services

10. PLANNED TRANSBORDER FLOWS OF PERSONAL INFORMATION

Some of our suppliers are in other countries with different levels of personal information protection. Still, we're comfortable with their protection of personal information.

We use Microsoft 365 to do our work and store all our information, including our clients' information. Microsoft stores all our content in the European Union. We believe that Microsoft provides adequate protection for the personal information we store with them. You can read more about their privacy undertakings on their website.

11. GENERAL DESCRIPTION OF INFORMATION SECURITY MEASURES IMPLEMENTED BY US

We have taken reasonable steps to protect the integrity and confidentiality of personal information.

We use internet security software to scan and block emails and websites with malicious content, block malware, detect incoming network attacks, and detect and block botnet communication.

We also use firewalls to protect our computers and regularly remind each other not to be idiots through training. That has been the most effective security measure we could have implemented.

12. WHO MAY REQUEST ACCESS TO RECORDS

You may request records from us if that record is required to exercise or protect your rights.

13. HOW YOU REQUEST ACCESS TO RECORDS

Our Information Officer has been appointed to deal with all PAIA related matters. To request access to a record, please complete Form 2 (available at <https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>) and submit the form and the request fee to our Information Officer via email, or by submitting it at our physical address.

The completed form must include the following:

- ⇒ enough information for our Information Officer to identify you, the records you request, and the form of access you require;
- ⇒ your email address, postal address, or fax number must be included;
- ⇒ you must describe the right you want to exercise or protect and why you need the requested record to exercise your right;



- ⇒ provide any other way you would like to be informed of our decision to provide the record or not other than in writing; and
- ⇒ it must provide proof of the capacity in which you are making the request if you are doing it on behalf of someone else.

If you do not use the standard form or if you do not provide enough information, we may reject or delay the request.

14. HOW WE GIVE YOU ACCESS

We evaluate and consider all requests we receive. If we approve it, we will decide the form of access we will provide unless you have requested the record in a specific form.

15. HOW MUCH THE RECORDS COST

PAIA allows us to charge a request and access fee. You must pay us the prescribed fees before we give you access to the records. On your request, our Information Officer will notify you of the application procedure.

Description	Amount
Request fee, payable by every requester	R140.00
Photocopy or printed black & white copy for every A4 page (Access fee)	R2.00 per page or part of the page
For a copy in a computer-readable form on a flash drive (provided by the requester)	R40.00
For a copy of visual images	This service will be outsourced. The fee will depend on the quotation from the service provider.
For a transcription of an audio record, per A4-size page	R24.00



Description	Amount
For each hour or part of an hour (excluding the first hour) reasonably required to search for, and prepare the record for disclosure	R145.00
The search and preparation fee cannot exceed	R435.00
Deposit: if the search exceeds 6 hours	One-third of the amount per request. It is calculated in terms of items 2 to 8 above.
Postage, email or any other electronic transfer	Actual expense, if any.

16. WHEN WE MAY REFUSE ACCESS TO A RECORD

We may refuse to provide you access to certain records to protect:

- ⇒ someone else's privacy;
- ⇒ another company's commercial information;
- ⇒ someone else's confidential information;
- ⇒ research information;
- ⇒ the safety of individuals and property; or
- ⇒ records privileged from production in legal proceedings.

We will let you know if your request has been approved or denied with our reason within 30 calendar days after receiving your request. If we cannot find the record or if it does not exist, we will notify you that it is not possible to give access to that record by affidavit.

17. WHAT YOU CAN DO IF WE REFUSE ACCESS TO A RECORD

If we refuse to give you access, you may apply to a court with jurisdiction or lodge a complaint with the Information Regulator at PAIAComplaints@inforegulator.org.za within 180 days from our notification refusing your request to access a record.

