

PAIA Manual

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

Date: 24 May 2023

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PAIA Manual

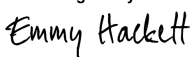
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Document Owner DPO

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DPO Approval

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Emmy Hackett	DPO	DocuSigned by:  F824F46BEA71411...	02 June 2023

Version History

Version	Summary of Changes	Issue Date
1.0	PAIA Manual created	24 May 2023

Please note that printed versions of this document are uncontrolled. Please refer to SHL SharePoint for the latest version.

1. List of acronyms and abbreviations

1.1	“CEO”	Chief Executive Officer
1.2	“DIO”	Deputy Information Officer.
1.3	“IO “	Information Officer.
1.4	“Minister”	Minister of Justice and Correctional Services.
1.5	“PAIA”	Promotion of Access to Information Act No. 2 of 2000(as Amended.
1.6	“POPIA”	Protection of Personal Information Act No.4 of 2013.
1.7	“Regulator”	Information Regulator; and
1.8	“Republic”	Republic of South Africa

2. Purpose of PAIA manual

This PAIA Manual is useful for the public to-

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request.
- 2.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject.
- 2.3 know the description of the records of the body which are available in accordance with any other legislation.

- 2.4 access 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.
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it.
- 2.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto.
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto.
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied.
- 2.9 know if the body has 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; and
- 2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. Key contact details for access to information of SAVILLE AND HOLSWORTH (PTY) LTD (SHL)

3.1. Information Officer

Name: Emmy Hackett
Tel: +27832531686
Email: emmy.hackett@shl.com

- 3.2. Deputy Information Officer *(NB: if more than one Deputy Information Officer is designated, please provide the details of every Deputy Information Officer of the body designated in terms of section 17 (1) of PAIA.*

Name: Ceridwen Mongie

Tel: +27832531686
Email: ceri.mongie@shl.com

3.3 Access to information general contacts

Email: dpo@shl.com

3.4 National or Head Office

Postal Address: Ground Floor Block D Southdowns Office Park, CNR of John Vorster Road and Karee Road, Iren Ext 54, Centurion 0157 South Africa

Physical Address: Ground Floor Block D Southdowns Office Park, CNR of John Vorster Road and Karee Road, Iren Ext 54, Centurion 0157 South Africa

Telephone: +27 12 6653130

Email: dpo@shl.com

Website: www.shl.com

4. Guide on how to use PAIA and how to obtain access to the guide.

4.1. 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 (“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 English and Zulu language.

4.3. The aforesaid Guide contains the description of-

4.3.1. the objects of PAIA and POPIA.

- 4.3.2. the postal and street address, phone and electronic mail address of-
 - 4.3.2.1. the Information Officer of every private body, and
 - 4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
- 4.3.3. the manner and form of a request for-
 - 4.3.3.1. access to a record of a private body contemplated in section 50³;
- 4.3.4. the assistance available from the Regulator in terms of PAIA and POPIA.
- 4.3.5. 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-
 - 4.3.5.1. an internal appeal.
 - 4.3.5.2. a complaint to the Regulator; and
 - 4.3.5.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body.
- 4.3.6. the provisions of sections 14⁴ and 51⁵ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual.

¹ Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

² Section 56(a) of POPIA- *Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

³ Section 50(1) of PAIA- *A requester must be given access to any record of a private body if-*

- a) *that record is required for the exercise or protection of any rights.*
- b) *that person complies with the procedural requirements in PAIA relating to a request for access to that record; and*
- c) *access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

⁴ Section 14(1) of PAIA- *The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.*

⁵ Section 51(1) of PAIA- *The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.*

- 4.3.7. the provisions of sections 15⁶ and 52⁷ providing for the voluntary disclosure of categories of records by a public body and private body, respectively.
- 4.3.8. the notices issued in terms of sections 22⁸ and 54⁹ regarding fees to be paid in relation to requests for access; and
- 4.3.9. the regulations made in terms of section 92¹⁰.
- 4.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.
- 4.5. The Guide can also be obtained-
 - 4.5.1. upon request to the Information Officer.
 - 4.5.2. from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).
- 4.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-
 - 4.6.1 English and Zulu

⁶ Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access.

⁷ Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access.

⁸ Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

⁹ Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹⁰ Section 92(1) of PAIA provides that – “The Minister may, by notice in the Gazette, make regulations regarding-

(a) any matter which is required or permitted by this Act to be prescribed.

(b) any matter relating to the fees contemplated in sections 22 and 54.

(c) any notice required by this Act.

(d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and

(e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

5. **Categories of records of SAVILLE AND HOLSWORTH (PTY) LTD (SHL) which are available without a person having to request access.**

Category of records	Types of the Record	Available on Website	Available upon request
SHL Website & Business Contact Privacy Notice	Transparency and disclosure document to SHL website users, social mediate sites and SHL platform users.	X	X
Cookie Policy	How and when SHL uses cookies	X	X

6. **Description of the records of SAVILLE AND HOLSWORTH (PTY) LTD (SHL) which are available in accordance with any other legislation.**

Category of Records	Applicable Legislation
Memorandum of incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000

7. Description of the subjects on which the body holds records and categories of records held on each subject by SAVILLE AND HOLSWORTH (PTY) LTD (SHL)

Subjects on which the body holds records	Categories of records
Customer employees and prospective employees	Name, Email Address, Gender, Language, Data Exporter ID, employee demographic information, responses to assessments or survey, audio recordings, visual images and any other data requested by the customer.
SHL employees	Employees records - Name, address, contact details, date of birth, salary, start date, next of kin/dependents, performance details.

8. Processing of Personal Information

8.1 Purpose of Processing Personal Information

For SHL to provide talent assessment products and services to SHL customers

8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Categories of Data Subjects	Personal Information that may be processed
Customer employees and prospective employees	Name, Email Address, Gender, Language, Data Exporter ID, employee demographic information, responses to assessments or survey, audio recordings, visual images and any other data requested by the customer.
Service Providers	Name, registration number, VAT number and address
Employees	Employees records - Name, address, contact details, date of birth, salary, start date, next of kin/dependents, performance details.

8.3 The recipients or categories of recipients to whom the personal information may be supplied.

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied.
Name, Email Address, Gender, Language, Company ID, employee demographic information, responses to assessments or surveys, audio recordings, visual images and any other data requested by Company	Amazon Web Services (AWS), Germany and backup in Ireland

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied.
Corporate Contact Details such as Name, job title, employer, email address & phone number	Salesforce, UK
Any personal information sent via email	Microsoft Office 365, UK
Name, email address, video images	Zoom, Netherlands
Name, email address and where calendar sync turned on by user all calendar details including any shared calendars	Nylas, Ireland
Name, email address	Azure, Netherlands
Name by default; additional categories dependent on contents of files shared.	Google Firebase, Belgium
Name, email address, video images	Twilio Screenshare, Germany

8.4 Planned transborder flows of personal information.

We store Personal Information in our data centers in Germany and backed up in Ireland. SHL affiliates also transfer your Personal Information outside South Africa to United States, India, and United Kingdom where a limited number of personnel, as well as our trusted third-party vendors and service providers, have access to Personal Information to provide services. All SHL affiliates have the same technical, physical, and administrative security controls and are required to comply with our data protection policies and procedures, applicable laws, governing the collection and use of personal information.

8.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

- Data encryption -All data is encrypted to industry leading standards when at rest (256-bit AES) and in transit (TLS 1.2). Data utilized in major third-party suppliers such as AWS (for

hosting) and Microsoft (email and productivity) is encrypted with keys maintained by Data importer to render the data inaccessible to the third party.

- Measures for ensuring ongoing confidentiality, integrity, availability and resilience of processing systems and services -SHL operates a business continuity and disaster recovery plan which is subject to ongoing testing and verification to ensure its suitability. The use of multiple data hosting sites in geographically disparate locations provides effective disaster recovery and service continuity in the event of an incident or outage. Data importer systems run weekly full backups with incremental daily backups which are encrypted and then transferred securely within the relevant AWS region.
- Processes for regularly testing, assessing, and evaluating the effectiveness of technical and organizational measures to ensure the security of the processing-As part of its ISO-accredited integrated management system, SHL conducts an internal audit programme to measure the effectiveness of its policies, procedures, and controls. Re-certification against ISO standards and other assurance initiatives provides external verification of the effectiveness of the IMS.
- Regular vulnerability testing is conducted across all internal systems and externally facing platforms to identify weaknesses and opportunities for improvement. This is supported by assessment against the OWASP Top Ten security risks, and annual external penetration testing of systems and web applications by a CREST-accredited supplier.
- Measures for user identification and authorization-SHL employees are assigned unique user IDs and login credentials to ensure proper identification and accountability of all users. Access is provisioned based on least privilege and role-based access control, validated by monthly review and audit of user system access lists.
- Authorization of access SHL systems is provided through multi-factor authentication and single sign-on services. SHL utilizes Zscaler Private Access to provide secure zero trust access to users of its applications.
- Measures for the protection of data during transmission-SHL utilizes TLS 1.2 for email services to provide encryption of data in transit. The transfer of any files containing personal information is facilitated through approved secure link services, password protection, and/or the encryption of data files to 256-bit AES.
- Measures for the protection of data during storage-Data at rest is subject to 256-bit AES encryption, utilizing keys operated entirely by SHL to ensure no third-party access to data. Stored data is provisioned to staff utilizing role-based access control, with full system and OS logs to verify and hold accountable users to their actions. All SHL system endpoints are subject to full-disk encryption, utilize host-based intrusion prevention systems, and prevent the use of physical storage media by default.
- Measures for ensuring physical security of locations at which personal data are processed - SHL monitors access to its facilities using Closed-Circuit Television (CCTV) cameras, security personnel, automated access control systems (e.g., badge-activated door locks), and other available control mechanisms dependent on site. All employees and approved third party individuals are issued ID/security badges to gain entry to Data importer facilities, which dependent on role provide access to specific areas within a locale. AWS and other third-party suppliers processing personal data are required to provide contractual agreement to and evidence of similar physical levels of protection provided by security controls and logging of access.
- Measures for ensuring events logging-SHL utilizes Rapid7's InsightIDR for incident detection and response, authentication monitoring, and endpoint visibility. InsightIDR is a Software as a Service (SaaS) tool that collects data from existing network security tools, authentication logs, and endpoint devices, aggregating the data at an on-premises centralized Collector. Logs are

stored for all systems through InsightIDR for a period of 12 months from the point of collection.

- Measures for ensuring system configuration, including default configuration-Through the use of centralized tools (InTune and ManageEngine), SHL implements and enforces the use of default configurations for end points. This includes the restriction of software to named and managed assets, web filtering, and ensuring the use of security tools. Updates and patching are managed through these systems to provide protection against vulnerabilities. The logging and monitoring of end points, along with the visibility of installed software packages and versions, ensures the consistent use of secure system configurations across the Data importer userbase.
- Measures for internal IT and IT security governance and management -SHL's integrated management system provides visibility and control of business practices relating to information technology, information security, business continuity, and data protection. This is achieved through comprehensive use of compliance documentation, audit, risk management and treatment, improvement identification and tracking, and externally assessed accreditations. Further governance is achieved through quarterly management review meetings by the Compliance Board to ensure that the integrated management system remains suitable, adequate, and effective, and meets the requirements of the organization. The Compliance Board consists of leaders across the organization, including the group managing director, and heads of IT, legal, and HR.
- Measures for certification/assurance of processes and products-To provide validation and assurance of the security of SHL's products and services, the organization holds external certifications in the areas of information security and data protection.

These include:

- ISO 20000 – Service Management System
 - ISO 22301 – Business Continuity Management System
 - ISO 27001 – Information Security Management System
 - ISO 27701 – Privacy Information Management
 - ISO 27018 – Protection of personally identifiable information (PII) in public clouds acting as PII processor.
 - Cloud Security Alliance (CSA) Security Trust Assurance and Risk (STAR) Security Programme
 - Cyber Security Essentials
 - All AWS regions utilized for data hosting are both ISO 27001 and SSAE 16/SOC 2 Type II certified.
- Measures for ensuring data minimization-SHL's products and services follow the principles of privacy-by-default and -by-design throughout their development and use lifecycles. A key part of this is ensuring only those categories of personal information are processed as required to ensure the provision of products and services. SHL ensures it understands and utilizes only those data categories that are essential for purpose using internal assessments such as PIAs and DPIAs across project lifecycles, and a pod system which sees a member of the information security team embedded in all projects from conception to delivery.
- Measures for ensuring data quality -Measures for ensuring limited data retention - SHL operates and measures through audits against its Data Retention Policy to ensure that personal data is deleted or anonymized at the end of its lifecycle or retention period.
- Measures for ensuring accountability-Through the use of staff awareness education and compliance training, SHL ensures that its employees understand their responsibilities around information security and data protection, and accountability for their actions. This is

underpinned using role-based access controls, confidentiality agreements, staff disciplinary processes, and full system logs.

- Measures for allowing data portability and ensuring erasure-Formal processes for data deletions and subject access requests are documented and shared with clients to facilitate the delivery of data subjects' rights. These are managed and tracked through a formal ticketing system with approvals, to ensure accurate and timely delivery.

9. Availability of the Manual

9.1 A copy of the Manual is available-

9.1.1 On www.shl.com.

9.1.2 head office of **SAVILLE AND HOLSWORTH (PTY) LTD (SHL)** for public inspection during normal business hours.

9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

9.1.4 to the Information Regulator upon request.

9.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

10. Updating of the Manual

The Information Officer will on a regular basis update this manual.

Issued by

DocuSigned by:

Emmy Hackett

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02 June 2023

Emmy Hackett

General Counsel, Chief Compliance Officer, and Data Protection Officer