



**PROMOTION OF ACCESS TO INFORMATION MANUAL FOR  
PLATFORM1 SYSTEMS (PTY) LTD**

**(a Private Body)**

**("Platform1")**

**MANUAL PREPARED IN ACCORDANCE WITH SECTIONS 10 AND 51 OF THE PROMOTION OF  
ACCESS TO INFORMATION ACT NO. 2 OF 2000 (the "Act") IN RESPECT OF PLATFORM1**

This PAIA Manual was last updated on 23 July 2022.

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## 1. INTRODUCTION

This Manual has been prepared in accordance with the requirements of the Promotion of Access to Information Act No. 2 of 2000 and contains the information specified in section 51(1) thereof. It contains information required by a person wishing to exercise any right, contemplated by the Act.

The aim of the Manual is to assist potential Requesters in requesting access to information (documents or records) from Platform1 as contemplated under the Act. The Manual may be amended from time to time and as soon as any amendments have been effected, the latest version of the Manual will be published and distributed in accordance with the Act.

The information as per this Manual, as applicable to a private body, is as follows:

- the contact details of the head of the private body;
- a description of the guide referred to in section 10 of the Act;
- the latest notice published by the Minister of Justice and Constitutional Development under section 52(2) of the Act;
- a description of the records of the private body which are available in terms of any legislation other than the Act;
- a description of the subjects on which the private body holds records and the categories of records held on each subject in sufficient detail to facilitate a request for access to a record; and
- other information as prescribed by regulation.

A Requester is invited to contact the Information Officer should he or she require any assistance in respect of the use or content of this Manual.

## 2. INTERPRETATION

The following words or expressions will bear the following meanings in this Manual:

"**the Act**" means the Promotion of Access to Information Act No. 2 of 2000, together with any regulations published thereunder;

"**Correspondence**" means written and electronic communication exchanged between two or more parties;

"**Customer**" means a natural or juristic person who or which receives services or products from Platform1;

"**Employee**" means any person who works for, or provides services to, or on behalf of Platform1, and receives or is entitled to receive remuneration;

"**Information Officer**" means the designated Platform1 information officer/s or the head of the body, as described in this Manual;

"**Manual**" means this manual, together with all annexures thereto as amended and made available at the offices of Platform1 from time to time;

"**Platform1**" means Platform1 Systems (Pty) Ltd (registration number 2019/248274/07), a private company which is a company providing a crime-fighting focused ANPR/LPR (Automatic Number Plate Recognition/License Plate Recognition) software and camera management solution and related services;

"**Requester**" means any person or entity requesting access to a record that is under the control of Platform1; and

"**SAHRC**" means the South African Human Rights Commission.

### 3. SCOPE OF THE MANUAL

This Manual has been prepared in respect of the South African entity **Platform1 Systems (Pty) Ltd** - Registration Number 2019/248274/07.

### 4. THE GUIDE ON HOW TO USE THE ACT TO ACCESS INFORMATION

*(Information provided in terms of section 51(1)(b) of the Act)*

The Act grants a Requester access to records of a private body if the record is required for the exercise or protection of any rights. If a public body lodges a request in terms of the Act, the public body must be acting in the public interest.

Requests in terms of the Act shall be made in accordance with the prescribed procedures, and at the prescribed fees.

A guide on how to use the Act is available and can be obtained on the Information Regulator of South Africa's website (<https://justice.gov.za/infoereg/docs.html>). Alternatively, any person wishing to obtain the guide can obtain same from the Information Regulator as well as direct any queries thereto, the contact details of which are as follows:

The Information Regulator of South Africa

PAIA Unit

**Postal Address:** P.O Box 31533, Braamfontein, Johannesburg, 2017, South Africa

**E** [PAIACompliance@infoeregulator.org.za](mailto:PAIACompliance@infoeregulator.org.za)

**W** <https://justice.gov.za/infoereg/index.html>

### 5. OVERVIEW OF PLATFORM1

Platform1 is a company involved in the pursuit of the ethical, value based and crime-fighting focused provision of an Automatic Number Plate Recognition/License Plate Recognition platform and, accordingly, offers a secure cloud based software solution and camera management product.

#### 5.1 Platform1's contact details

*(Information required under section 51(1)(a) of the Act)*

**Name of Body**

Platform1 Systems (Pty) Ltd

**Physical & Postal Addresses**Physical Address:

#3 Meulenhof, 93 Main Road, Mowbray, Cape Town, 7700, South Africa

Postal Address:

Postnet Suite 109, Private Bag X18, Rondebosch, Cape Town, 7701, South Africa

**Head of Body Name:**

Mr. A Barnes

T +27 82 727 8295

E [andrew@platform1.co.za](mailto:andrew@platform1.co.za)

**5.2 Information freely available from Platform1**

No notice has been published in terms of section 52. However, certain information and records are freely available without needing to be requested in terms of the request procedures set out in the Act and provided for in this manual.

**5.3 Information kept by Platform1 in accordance with other legislation**

Records are kept in accordance with legislation applicable to Platform1 and these records may in certain instances only be accessed by the persons specified in the relevant legislation. Such records include but is not limited to, the following -

- Companies Act, No. 61 of 1973;
- Companies Act, No. 71 of 2008;
- Competition Act, No. 89 of 1998;
- Consumer Protection Act, No. 68 of 2008;
- Copyright Act, No. 98 of 1978;
- Currency and Exchanges Act, No. 9 of 1933;
- Electronic Communications and Transactions Act, No. 25 of 2002;
- Employment Equity Act, No. 55 of 1998;
- Financial Intelligence Centre Act, No. 38 of 2001;
- Income Tax Act, No. 58 of 1962;
- Protection of Personal Information Act, No.4 of 2013;
- Regulation of Interception of Communications and Provision of Communication-Related Information Act, No. 70 of 2002;
- Trade Marks Act, No. 194 of 1993;
- Value Added Tax Act, No. 89 of 1991.

- Basic Conditions of Employment Act, No. 75 of 1997;
- Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993;
- Pension Funds Act, No. 24 of 1956;
- Medical Schemes Act, No. 131 of 1998;
- Labour Relations Act, No. 66 of 1995;
- Occupational Health and Safety Act, No. 85 of 1993;
- Skills Development Act, No. 97 of 1998;
- Skills Development Levies Act, No. 9 of 1999;
- Tax on Retirement Funds Act; No. 38 of 1996;
- Unemployment Insurance Act, No. 63 of 2001;
- Unemployment Insurance Contributions Act, No. 4 of 2002;

Records kept in terms of the above legislation may, in certain instances (and insofar as the information contained therein is of a public nature) be available for inspection without a person having to request access thereto in terms of the Act.

#### 5.4 Information held by Platform1 in terms of the Act

| CATEGORIES OF RECORD                 | DESCRIPTION OF RECORD                                     |
|--------------------------------------|---|
| <b>Administration and Management</b> | Shareholder records                                       |
|                                      | Share register  |
|                                      | Minutes of director meetings                              |
|                                      | Director Resolutions                                      |
| <b>Financial Records</b>             | Annual financial statements of Platform1                  |
|                                      | Tax returns of Platform1                                  |
|                                      | Accounting records of Platform1                           |
|                                      | Bank Statements and Banking records of Platform1          |
|                                      | Audit reports conducted for Platform1                     |
|                                      | Invoices in respect of creditors and debtors of Platform1 |
|                                      | Bank facilities and account details                       |
| <b>Company Records</b>               | Records regarding financial commitments                   |
|                                      | Documents of incorporation                                |
|                                      | Memorandum and Articles of Association                    |
| <b>Human Resources</b>               | Share register and other statutory registers              |
|                                      | Personnel records of each employee of Platform1           |

|                                       |  |
|---------------------------------------|--|
|                                       | Records relating to conditions of employment   |
|                                       | Employee tax information   |
|                                       | Training schedules and manuals   |
|                                       | Agreements with customers of Platform1   |
|                                       | Payroll records  |
|                                       | Internal policies and procedures   |
|                                       | Information relating to prospective employees including curricula vitae and application forms  |
| <b>Platform1 Customers</b>            | Customer documentation in terms of Financial Intelligence Centre Act No. 38 of 2001  |
|                                       | Correspondence with customers and third parties  |
| <b>Intellectual Property</b>          | Trade-marks, copyrights and designs held by Platform1  |
|                                       | Software licences  |
|                                       | Records relating to domain names   |
| <b>Immovable and Movable Property</b> | Agreements for the lease of immovable property by Platform1  |
|                                       | Agreements for the lease or sale of movable property by Platform1  |
|                                       | Records regarding insurance in respect of movable property   |
|                                       | Records regarding insurance in respect of immovable property   |
| <b>Information Technology</b>         | Records regarding computer systems and programmes held by Platform1  |
| <b>Website</b>                        | Platform1's website address is <a href="https://platform1.co.za/">https://platform1.co.za/</a> and is accessible to anyone who has access to the Internet. |
| <b>Miscellaneous</b>                  | Security agreements, guarantees and indemnities  |
|                                       | Marketing agreements   |
|                                       | Internal correspondence  |
|                                       | Suretyship agreements  |

Supplier lists and details of suppliers

Agreements with suppliers of Platform1

## 5.5 Request Procedures

Records will only be made available subject to the provisions of the Act.

The Requester must use the prescribed form to make the request for access to a record to Platform1's designated Information Officer at the address, fax number or electronic mail address of Platform1. A copy of the form is attached as Annexure A to this manual. The Requester must identify the right that is sought to be exercised or protected and provide an explanation of why the requested record is required for the exercise or protection of that right.

The Requester must also provide sufficient detail on the request form to enable the Information Officer to identify the record and the Requester. The Requester should also indicate which form of access is required and specify a postal address, fax number in the Republic or email address. The Requester should also indicate if, in addition to a written reply, any other manner is to be used to inform the Requester and state the necessary particulars to be so informed.

If a request is made on behalf of another person, the Requester must submit proof of the capacity in which the Requester is making the request to the satisfaction of the head of Platform1.

After the Information Officer has made a decision on the request, the Requester will be notified using the required form. If the request is granted then a further access fee must be paid for reproduction, for search and preparation, and for any time that has exceeded the prescribed hours to search for and prepare the record for disclosure [See s 54(6) of the Act].

In terms of Part 3, Chapter 4 of the Act Platform1 may and in certain instances must refuse access to records on the grounds set out in the Act. The grounds include:

- that granting access would result in the unreasonable disclosure of personal information about a third party;
- that it is necessary to protect the commercial information or the confidential information of a third party;
- that it is necessary to protect the commercial information of a third parties or of Platform1 itself;
- that it is necessary to protect the safety of individuals or property;
- that it is necessary to protect the research information of a third party or of Platform1; and
- that the record constitutes privileged information for the purposes of legal proceedings.

## 5.6 Fees Payable

A Requester has to pay a request fee of R50.00 to a private body such as Platform1, other than where the requester is seeking access to a record containing personal information about him, her or itself. This request fee may be paid at the time a request is made, or the Information Officer may notify the Requester to pay the request fee before processing the request any further. A Requester may make an application to Court to be exempted from the requirement to pay the request fee.

A Requester whose request for access to a record or records held by Platform1 is granted is also required to pay an access fee for the reproduction of the record or records, and for the search for and the preparation of the records for disclosure. Platform1 is entitled to withhold a record until the required access fees have been paid, which are payable as follows:

| Action Required  | Fee Payable     |
|--|-----------------|
| Photocopy of an A4-size page or part thereof   | R1.10 per page  |
| Printed copy of an A4-size page or part thereof held on a computer or in electronic or machine readable form | R0.75 per page  |
| For a copy in a computer-readable form on – Stiffy disc / Compact disc                                       | R7.50 / R70.00  |
| Transcription of visual images on an A4-size page or part thereof  | R40.00 per page |
| Copy of visual images  | R60.00          |
| Transcription of an audio record on an A4-size page or part thereof  | R20.00          |
| Copy of an audio record  | R30.00          |

In addition, if the search for and preparation of the record or records requested takes more than six hours, Platform1 may charge R30.00 for each hour or part thereof which is required for the search for and preparation of the records. Moreover, if Platform1 is of the opinion that the search and preparation of the records requested will require more than six hours, it is entitled to ask for a deposit of one third of the access fees which will be payable in respect of the records requested by the Requester. In such event, the Requester may make an application to Court to be exempted from the requirement to pay this deposit. If a deposit is made and access to the records requested is subsequently refused, the deposit will be repaid to the Requester.

## 6. RECORDS OR INFORMATION NOT FOUND

If, after all reasonable steps to locate a record have been taken, and no record is found, then the Information Officer will notify the Requester, by way of an affirmation or affidavit that access to the requested and titled document cannot be provided. The affirmation or affidavit will include detailed account of the steps taken to try locate the record.

Should a record be found at a later stage, the Information Officer shall provide the Requester access to such record, unless access to the record is refused on the grounds permitted by the Act (Part 3, Chapter 4).

#### **7. OTHER INFORMATION HELD BY PLATFORM1 AS PRESCRIBED**

The Minister has not prescribed that any further information must be contained in this manual.

#### **8. AVAILABILITY OF THE MANUAL**

This Manual is available in terms of section 51(3) of the Act for inspection by the general public upon request, during office hours and free of charge, at the offices of Platform1. Copies of the Manual may be made, subject to the prescribed fees.

The Manual is also posted on Platform1's website referred to above.

#### **9. INFORMATION REQUESTED ABOUT A THIRD PARTY**

Where any information is requested from Platform1 that relates to a third party, Platform1 is required to notify the third party of the request. The third party has an opportunity to grant his, her or its consent to the disclosure of the record or to make representations as to why the requested record should not be disclosed to the Requester. If Platform1 decides to grant access to the record, it will notify the affected third party again. The third party is entitled to apply to court in relation to that decision. The court will then determine whether the record should be disclosed by Platform1 or not.

#### **10. PRESCRIBED FORMS AND FEE STRUCTURE**

The forms and fee structure prescribed under the Act in respect of private bodies in terms of sections 53 and 54 of the Act are available from the Government Gazette, or at the website of the Department of Justice and Constitutional Development ([www.doj.gov.za](http://www.doj.gov.za)).

Furthermore, at Annexure A attached hereto.

**ANNEXURE A**

**FORM C**

**REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY**

(Section 53(1) of the Promotion of Access to Information Act, 2000

(Act No. 2 of 2000))

[Regulation 10]

A. Particulars of private body:

The Head: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

B. Particulars of person requesting access to the record:

- a. The particulars of the person who requests access to the record must be given below.
- b. The address and/or fax number in the Republic to which the information is to be sent, must be given.
- c. Proof of the capacity in which the request is made, if applicable, must be attached.

Full names and surname: \_\_\_\_\_

Identity number: \_\_\_\_\_

Postal address: \_\_\_\_\_

Attention: \_\_\_\_\_

Fax number: \_\_\_\_\_

Telephone number: \_\_\_\_\_

E-mail address: \_\_\_\_\_

Capacity in which request is made, when made on behalf of another person: \_\_\_\_\_

\_\_\_\_\_

**C. Particulars of person on whose behalf request is made:**

*This section must be completed ONLY if a request for information is made on behalf of another person.*

Full names and surname: \_\_\_\_\_

Identity number: \_\_\_\_\_

**D. Particulars of record:**

- (a) Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located.
- (b) If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

Description of record or relevant part of the record:

\_\_\_\_\_

Reference number, if available: \_\_\_\_\_

Any further particulars of record:

\_\_\_\_\_

**E. 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
- (d) the time required to search for and prepare a record.
- (e) If you qualify for exemption of the payment of any fee, please state the reason for exemption.

Reason for exemption from payment of fees:

\_\_\_\_\_

\_\_\_\_\_

**F. Form of access to record:**

*If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 below, state your disability and indicate in which form the record is required.*

| Disability: | Form in which record is required: |
|-------------|-----------------------------------|
|             |                                   |
|             |                                   |
|             |                                   |

Mark the appropriate box with an X.

NOTES:

- (a) Compliance with your request for access in the specified form may depend on the form in which the record is available.
- (b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.
- (c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.

1. If the record is in written or printed form:

|  |                 |  |                      |
|--|-----------------|--|----------------------|
|  | Copy of record* |  | Inspection of record |
|--|-----------------|--|----------------------|

2. If record consists of visual images - (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.):

|  |                 |  |                     |  |                             |
|--|-----------------|--|---------------------|--|-----------------------------|
|  | View the images |  | Copy of the images* |  | Transcription of the images |
|--|-----------------|--|---------------------|--|-----------------------------|

3. If record consists of recorded words or information which can be reproduced in sound:

|  |   |  |   |
|--|---|--|---|
|  | Listen to the soundtrack (audio cassette) |  | Transcription of soundtrack (written or printed document) |
|--|---|--|---|

4. If record is held on computer or in an electronic or machine-readable form:

|  |                         |  |  |  |  |
|--|-------------------------|--|--|--|--|
|  | Printed copy of record* |  | Printed copy of information derived from the record* |  | Copy in computer readable form* (stiffy or compact disk) |
|--|-------------------------|--|--|--|--|

|  |     |    |
|--|-----|----|
| <p>*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you?<br/><b>Postage is payable</b></p> | YES | NO |
|--|-----|----|

G. Particulars of right to be exercised or protected:

If the provided space is inadequate, please continue on a separate folio and attach it to this form. **The requester must sign all the additional folios.**

Indicate which right is to be exercised or protected:

---

---

Explain why the record requested is required for the exercise or protection of the aforementioned right:

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H. Notice of decision regarding request for access:

You will be notified in writing whether your request has been approved/denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the record?

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Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_\_

\_\_\_\_\_  
SIGNATURE OF REQUESTER /  
PERSON ON WHOSE BEHALF  
REQUEST IS MADE

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