



**TRACKER CONNECT (PROPRIETARY) LIMITED**  
**Registration Number (2011/003946/07)**  
**("Tracker")**

**MANUAL PREPARED IN ACCORDANCE WITH SECTION 51 OF THE PROMOTION OF ACCESS TO  
INFORMATION ACT, NO 2 OF 2000**

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**INDEX:**

- 1. INTRODUCTION**
- 2. PURPOSE OF THE MANUAL**
- 3. CONTACT DETAILS**
- 4. APPLICABLE LEGISLATION (PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000,  
(Section 51(1)(b))**
- 5. NOTICES (Section 51(1)(c))**
- 6. RECORDS WE HOLD**
- 7. SCHEDULE OF RECORDS (Section 51(1)(d))**
- 8. RECORDS HELD BY THE COMPANY**
- 9. REQUEST PROCEDURE (Section 51(1)(e))**
- 10. REQUEST PROCEDURE**
- 11. INFORMATION SECURITY**
- 12. UPDATES TO THIS MANUAL (Section 51(4))**
- 13. LEGISLATIVE AND REGULATORY FRAMEWORK**
- 14. FEES IN RESPECT OF PRIVATE BODIES**

- **Annexure A**

## **PARTICULARS IN TERMS OF THE SECTION 51 MANUAL**

### **1. INTRODUCTION**

This Manual is published in terms of Section 14 of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000).

### **2. PURPOSE OF THE MANUAL**

The purpose of the Manual is to help you access Tracker information and any other information that we may hold and to which you may be entitled to. PAIA requires us to make it available to you so that:

- you know what types of information we have; and
- you can request it.

### **3. CONTACT DETAILS (Section 51(1)(a))**

The Chief Executive Officer has duly authorised the Information Officer to deal with all matters in connection with requests for information in terms of PAIA.

<b>Non-Executive Directors:</b>	J Newbury (Chairman); Y Moodley; C Pongweni; E Mbutia; P Madangombe; Z Abdulla
<b>Executive Directors:</b>	W de Nobrega (CEO); A Badul (CFO);
<b>Information Officer:</b>	Etienne Bosman
<b>Postal Address:</b>	P.O. Box 2492, Cresta, 211
<b>Street Address:</b>	Stonemill Office Park, 340 Republic Road, Darrenwood, 2194
<b>Telephone Number:</b>	011 380 0300
<b>Email Address:</b>	<a href="mailto:popi@tracker.co.za">popi@tracker.co.za</a> and <a href="mailto:ipo@tracker.co.za">ipo@tracker.co.za</a>

### **4. THE PAIA MANUAL (Section 51(1)(b))**

This Manual has been compiled in accordance with Section 10 of PAIA by the South African Human Rights Commission.

The Manual is available from the South African Human Rights Commission. Please direct any queries to:

The South African Human Rights Commission:  
PAIA Unit, the Research and Documentation Department  
Telephone  
+27 11 484-8300 Number:  
Fax: +27 11 484-0582  
Website [www.sahrc.org.za](http://www.sahrc.org.za)  
E-mail: [paia@sahrc.org.za](mailto:paia@sahrc.org.za)  
Postal Address: Private Bag X2700, Houghton, 2041

## 5. NOTICES (Section 51(1)(c))

Notice(s) in terms of PAIA:

At this stage, no notice(s) has/have been published by the Minister on the categories of information available without a person having to request access in terms of PAIA. However, certain records / information is freely available on our website.

## 6. RECORDS WE HOLD

Categories of information collected about you and your dependants or employees may include:

- General identification and contact information.
- Your name, address, e-mail address, telephone number, gender, marital status (Tracker employees only), date of birth, passwords and activity records (such as driving behaviour and location of your vehicle).
- Identification numbers issued by government bodies or agencies.
- Identity and passport number
- VIN number and registration number of your vehicle.
- Vehicle make and model.
- Financial information and bank account details.
- Credit history and credit score and other financial information.
- Medical condition and health status (Tracker employees only).
- Other sensitive information (Tracker employees only).
- We may obtain information about your criminal record or civil litigation history in the process of preventing, detecting and investigating fraud or in the employment process. We may also obtain sensitive information if you voluntarily provide it to us (for example, if you express preferences regarding medical treatment based on your religious beliefs) (Tracker employees only).
- Telephone recordings.
- Recordings of telephone calls to and from our representatives and call centres.
- Information to investigate crime, including fraud and money laundering (for example, we will share information with insurers who are investigating an insurance claim or with the SAPS who are investigating a criminal matter).
- Information enabling us to provide products and services.

- Location and identification of your vehicle (for example, vehicle coordinates and vehicle license plate or VIN number).

## 7. RECORDS AVAILABLE IN TERMS OF LEGISLATION (Section 51(1)(d))

Records available in terms of any other legislation applicable to our business:

Broad Based Black Economic Empowerment Act 53 of 2003(as amended)  
 Basic Conditions of Employment Act 75 of 1997(as amended)  
 Companies Act, 71 of 2008  
 Compensation for Occupational Injuries and Diseases Act, 130 of 1993  
 Competition Act 89 of 1998 (as amended)  
 Criminal Procedure Act No 51 of 1977(as amended)  
 Consumer Protection Act, 68 of 2008  
 Constitution of RSA Act 108 of 1996 (as amended)  
 Copyright Act, 98 of 1978  
 Cross-border Road Transport Agency Act 4 1998 (as amended)  
 Customs and Excise Act 32 of 2014  
 Designs Act 195 of 1993  
 Dangerous Weapons Act 15 of 2013 (as amended)  
 Electronic Communications and Transactions Act 25 of 2002  
 Employment Equity Act, 55 of 1998  
 Employment Services Act 4 of 2014  
 Employment Tax Incentive Act 26 of 2013  
 Environment Conservation Act 73 of 1989  
 Financial Advisory and Intermediary Services Act, 37 of 2002  
 Financial Intelligence Centre Act 38 of 2001 (FICA) (as amended)  
 Firearms Control Act 60 of 2000 (as amended)  
 Further Education and Training Colleges Act 16 of 2006 (as amended by Higher Education and Training Laws Amendment Act.)  
 Independent Communications Authority of SA Act 13 of 2000 (ICASA)(as amended)  
 Income Tax Act, 58 of 1962  
 Intellectual Property Laws Amendment Act 28 of 2013  
 Intellectual Property Rights from Publicly Financed Research & Development Act 51 of 2008  
 Interception & Monitoring Prohibition Act No 127 of 1992 (as amended)  
 Labour Relations Act 66 of 1995(as amended)  
 National Qualifications Framework Act 67 of 2008 (as amended)  
 Occupational Health and Safety Act, 85 of 1993  
 Patents Act 57 of 1978 (as amended)  
 Prescribed Rate of Interest Amendment Act 7 of 1997  
 Prevention of Organised Crime Act, 121 of 1998  
 Prevention and Combatting of Corrupt Activities, Act 12 of 2004  
 Private Security Industry Regulating Act No 56 of 2001  
 Private Security Industry Levies Act 23 of 2002  
 Promotion of Equality and Prevention of Unfair Discrimination Act, 4 of 2000  
 Protected Disclosures Act 26 of 2000  
 Protection of Personal Information Act, 4 of 2014  
 Regulation of Interception of Communications and Provision of Communication-Related

Information Act 70 of 2002 (RICA)  
Short Term Insurance Act of 1998(as amended)  
South African Revenue Services Act, 34 of 1997  
Skills Development Levies Act, 97 of 1998  
Tax Administration Act 16 of 2016  
Trademarks Act, 94 of 1993  
Unemployment Insurance Act, 63 of 2001  
Unemployment Insurance Contributions Act 4 of 2002  
Value Added Tax Act, 89 of 1991

## 8. RECORDS HELD BY THE COMPANY

In terms of records that may be requested, the mere fact that the information of the company is listed in the Manual does not mean that the information will be made available. The company in terms of Chapter 4 of PAIA, has the right to refuse a request for information should any of the grounds of refusal as set out in Chapter 4 of the Act, exist.

For instance, we may have to refuse you access to certain records in terms of PAIA to protect:

- someone else's privacy;
- Tracker's confidential information;
- Information that by agreement between Tracker and a third party, is confidential (for example the content of a confidential agreement);
- another company's personal, commercial or confidential information;
- someone else's confidential information;
- the safety of individuals and property;
- records privileged from production in legal proceedings;
- research information; or
- commercial activities of Tracker, which may include trade secrets, intellectual property, proprietary information, financial information, commercial information or technical information which disclosure would likely cause harm to the business interests of Tracker.

We will notify you in writing whether your request has been approved or denied within 30 (thirty) calendar days after we have received a completed Request for Access form. If we cannot find any requested record or it does not exist, then we will notify you that it is not possible to give access to that particular record.

### **Web Page**

The Web Page ([www.tracker.co.za](http://www.tracker.co.za)) is accessible to anyone who has access to the Internet. The web page has the following categories:

- About Tracker
- If your vehicle is stolen
- Products
- How to get a Tracker
- Fitment Centres
- Tracker Offices
- Tracker Insight Overview

- Why Tracker
- Our Partners
- Corporate and Social Investment
- Our Brand
- Frequently asked questions
- Contact Tracker
- Tracker Vacancies
- Consumer Support
- Consumer App
- Disclaimer
- Copyrights
- Information Manual
- Privacy Policy
- Terms of use
- My Tracker Self Service Centre
- Legal and Governance
- Plans and Pricing
- Media Gallery
- Brochure downloads
- Rate our Service
- Terms and Conditions
- Features and Benefits
- New Products
- News Room

### **Company Secretarial and Legal**

- Agreements
- Company Secretarial Records
- Trademarks and Patents

### **Finance**

- Financial Statements
- Management Accounts
- Budgets
- Management Plans
- Asset Registers
- Company Policies
- Banking Records
- Purchasing Records
- Audit Reports

### **Security**

- Records
- Biometric Access Details

## Human Resources

- Policies
- Benefits
- Provident Fund
- Staff Records
- Employment Equity Reports
- Skills Development Reports
- Training and Development Records
- Industrial Relations Records
- Payroll Records
- Medical Aid Information

## Operational

- Database
- Database and Computer Software
- Health and Safety Records
- Maintenance Records
- Details

## 9. REQUEST PROCEDURE

Should you request information in terms of PAIA, please complete the prescribed form.

The request form can be accessed on [www.justice.gov.za](http://www.justice.gov.za). (A copy of the form is attached as Annexure A)

Remember to indicate the following on the form:

- Form of access required;
- Identify the right you want to exercise or protect and give an explanation why the record is needed for that purpose;
- Specify a postal address or fax number in South Africa or an e-mail address;
- Proof of the capacity in which you are acting, if requesting access on behalf of a third party.

## 10. INFORMATION SECURITY

We secure our data by maintaining reasonable measures to protect personal information from loss or misuse and unauthorized access, disclosure, alteration and destruction. We also take reasonable steps to keep personal information accurate, current, complete and reliable for its intended use.

## 11. UPDATES TO THIS MANUAL (Section 51(4))

This Manual will be updated and amended from time to time.

## 12. LEGISLATIVE AND REGULATORY FRAMEWORK

This Manual should be read in conjunction with the following legislative framework:

- Promotion of Access to Information Act 2 of 2000; -
- Protection of Personal Information Act 4 of 2014.

## 13. AVAILABILITY OF THE MANUAL

In accordance with the Regulations to the Act, the Manual has been made available to the South African Human Rights Commission (SAHRC). It can be accessed on their website ([www.sahrc.org.za](http://www.sahrc.org.za)) and will be published in the Government Gazette. The Manual is also published on Tracker's website at [www.tracker.co.za](http://www.tracker.co.za), together with the prescribed form and the fees applicable.

## 14. FEES IN RESPECT OF PRIVATE BODIES

You must pay the requested fee as required by law when submitting a request for access to information.

The prescribed fees are set out in the Fee Schedule which is available from SAHRC, alternatively access the following link:

<https://www.sahrc.org.za/home/21/files/PAIA%20Notice%20on%20fees.pdf>

You must pay the fees before Tracker hands over the requested information. You have to pay a further access fee if we grant the request for any time that has exceeded the prescribed hours to search and prepare the records for disclosure.



**ANNEXURE A**

**PRESCRIBED FORM C**

**REQUEST FOR ACCESS TO RECORDS OF  
TRACKER CONNECT (PROPRIETARY) LIMITED  
(and its holding and subsidiary companies)**

**SECTION 53(1) OF THE PROMOTION OF ACCESS TO INFORMATION ACT, 2000 (ACT  
NO. 2 OF 2000))**

**A. PARTICULARS OF PERSON REQUESTING ACCESS TO THE RECORD**

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

Full names and surname:

\_\_\_\_\_

Identity number:

\_\_\_\_\_

Postal address:

\_\_\_\_\_

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

E-mail address:

\_\_\_\_\_

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

\_\_\_\_\_

\_\_\_\_\_

B. 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:

\_\_\_\_\_

C. 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.***

1. Description of record or relevant part of the record: \_\_\_\_\_
2. Reference number, if available: \_\_\_\_\_
3. Any further particulars of record: \_\_\_\_\_

D. 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 the reasonable time required to search for and prepare a record.*

*(d) If you qualify for exemption of the payment of any fee, please state the reason for exemption.*

Reason for exemption from payment of fees:

\_\_\_\_\_

\_\_\_\_\_

E. FORM OF ACCESS TO RECORD

<i>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 hereunder, state your disability and indicate in which form the record is required.</i>	
Disability:	Form in which record is required
<p>Mark the appropriate box with an X.</p> <p>NOTES:</p> <p>(a) Compliance with your request in the specified form may depend on the form in which the record is available.</p> <p>(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.</p> <p>(c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.</p>	

<b>1. If the record is in written or printed form:</b>					
<input type="checkbox"/>	Copy of record*	<input type="checkbox"/>	Inspection of record		
<b>2. If record consists of visual images</b> (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.):					
<input type="checkbox"/>	View the images of the images	<input type="checkbox"/>	Copy of the images* <input type="checkbox"/> Transcription		
<b>3. If record consists of recorded words or information which can be reproduced in sound:</b>					
<input type="checkbox"/>	Listen to the sound track (audio cassette)	<input type="checkbox"/>	Transcription of sound track* (written or printed document)		
<b>4. If record is held on computer or in an electronic or machine readable form:</b>					
<input type="checkbox"/>	Printed copy of record*	<input type="checkbox"/>	Printed copy of information derived from the record* <input type="checkbox"/> Copy in computer readable form* (stiffy or compact disc)		
*If you requested a copy or transcript of a record (above), do you wish the copy or transcription to be posted to you?			<table border="1"> <tr> <td>YES</td> <td>NO</td> </tr> </table>	YES	NO
YES	NO				
<b>Postage is payable.</b>					

F. 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.

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

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G. 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?

SIGNED AT \_\_\_\_\_ THIS \_\_\_\_\_ DAY OF \_\_\_\_\_ 20\_\_

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