

SeritoScape (Pty) Limited t/a Torque Trader
With registration number 2022/215448/07

PAIA MANUAL

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended)
and to address the requirements of sections 23-25 of the Protection of Personal Information Act 4 of
2013 (as amended)

1. INTRODUCTION

The Company provides a free-to-use platform that allows sellers to list and sell their luxury, exotic, muscle, custom/bespoke, vintage, classic and supercar vehicles online and for purchasers to search for and purchase a vehicle listed on the platform. Once a sale transaction is finalised, the seller and purchaser pay the Company a commission calculated as a percentage of the value of the sale transaction concluded.

2. DEFINITIONS

The following definitions are used in this PAIA Manual:

- 2.1. **“Company”** means SeritoScape (Pty) Limited t/a Torque Trader, with registration number 2022/215448/07;
- 2.2. **“Guide”** means the Guide on how to use PAIA updated and published by the Regulator;
- 2.3. **“PAIA”** means the Promotion of Access to Information Act 2 of 2000, as amended;
- 2.4. **“PAIA Manual”** means the Company’s PAIA manual as set out in this document, as amended or replaced from time to time;
- 2.5. **“POPIA”** means the Protection of Personal Information Act 3 of 2013, as amended
- 2.6. **“Regulator”** means the Information Regulator.

3. PURPOSE OF THIS PAIA MANUAL

The purpose of this PAIA Manual is to provide the public with details about:

- 3.1. the contact details of the head of the Company;
- 3.2. the categories and types of records held by the Company;
- 3.3. how personal information is collected, processed and the purpose for such processing;
- 3.4. any transborder flow of personal information;
- 3.5. the security measures put in place by the Company to protect the confidentiality and integrity of the personal information; and
- 3.6. the procedures for a person to request access to record/s and/or personal information held by the Company and the fees associated with such requests.

4. CONTACT DETAILS OF THE HEAD OF THE COMPANY

Name	Anton Roux
Telephone	011 463 8745
Mobile	083 600 9999
Email Address:	anton@rsautosport.co.za
Physical Address:	212 Bram Fischer Drive, Kensington B, Randburg, 2194.
Website:	www.torquetrader.co.za

5. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

- 5.1. The Regulator has, in terms of section 10 of PAIA, published the updated Guide that provides information that may be needed by any person who wishes to exercise any right contained in PAIA and POPIA.
- 5.2. The Guide is available in each of the official languages and in braille.
- 5.3. The Guide can be obtained from the website of the Regulator (<https://www.inforegulator.org.za/docs.html>).

6. RECORDS HELD BY THE COMPANY WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

The following records are available to a person without needing to request access to them.

Types of the Record	How you can access it
Details of incorporation of the Company	BizPortal (https://www.bizportal.gov.za/) or from Companies and Intellectual Property Commission (“CIPC”)
Director/s	BizPortal (https://www.bizportal.gov.za/) or from Companies and Intellectual Property Commission (“CIPC”)
Banking details	Request via email
Information relating to the Company's products and services	Visit the Company's website
Newsletter	Subscribe on the Company's website

7. CATEGORIES AND TYPES OF RECORDS HELD BY THE COMPANY THAT ARE NOT AUTOMATICALLY AVAILABLE

The Company holds the following records in electronic or physical format. These records are not automatically available. A person may request access to them by following the procedure set out in paragraph.

Categories of the Records	Types of Records
Agreements	Financing agreements Supplier/service agreements Terms and conditions Third party agreements Lease agreements
Business records	Business plans and strategies Databases Intellectual property Internal correspondence Operational records Systems and information technology
Company information	Certificate of incorporate Memorandum of incorporate Share certificates and share transfers

Categories of the Records	Types of Records
	Directors Minutes of meetings Resolutions Auditors
Customer information	Customer contracts Customer information and databases Communications with customers Sales records Transactional information
Employee records	Disciplinary codes and records Employment contracts Employment Equity Plan Grievance procedures Health and safety records Leave records List of employees Medical records Payroll records Pension/Provident fund records Performance records Personal information of employees Policies and procedures Recruitment records Salaries of employees Training manuals, schedules and records Other statutory records
Financial records	Accounting records Annual financial statements / management accounts Asset registers Audit reports Bank statements Banking details and bank accounts Debtors/creditors statements and invoices Insurance Invoices Skills Development levies Supplier records and information Tax records (Company and employees)
Marketing records	Advertising and promotional material

Categories of the Records	Types of Records
	Market research records Marketing strategies and records Product and service information

8. RECORDS HELD BY THE COMPANY TO COMPLY WITH LEGISLATION

The Company holds various records to comply with South African legislation, including the following:

Category of Records	Applicable Legislation
Company records	Companies Act 71 of 2008
Finance	Financial Intelligence Centre Act 38 of 2001 Income Tax Act 58 of 1962 Tax Administration Act 28 of 2011 Value-Added Tax Act 89 of 1991
General	Consumer Protection Act 68 of 2008 Electronic Communications and Transactions Act 25 of 2002 Promotion of Access to Information Act 2 of 2000 Protection of Personal Information Act 4 of 2013
Personnel	Basic Conditions of Employment Act 75 of 1997 Compensation for Occupational Injuries and Diseases Act 130 of 1993 Employment Equity Act 55 of 1998 Labour Relations Act 66 of 1995 Occupational Health and Safety Act 85 of 1993 Skills Development Act 97 of 1998 Skills Development Levies Act 9 of 1999 Unemployment Insurance Contributions Act 4 of 2002 Unemployment Insurance Act 63 of 2001

9. REQUESTS FOR ACCESS TO RECORD/S IN TERMS OF PAIA

9.1. Procedure to Request Access to Record/s

- 9.1.1. All requests for access to records in terms of PAIA will be evaluated on a case by case basis in accordance with the provisions of PAIA. The Company reserves the right to refuse access to certain records as set out in paragraph 9.4 of this PAIA Manual.
- 9.1.2. Publication of this PAIA Manual does not give rise to any rights to access records, except in terms of PAIA.
- 9.1.3. Requests for records can only be processed for records that exist at the time the Company receives the request and for records that are in its possession or under its control.
- 9.1.4. Please complete Form 2 Request for Access to Record in terms of Section 53 of PAIA in full and submit the signed Form 2 to the information officer's email address

or deliver it to the Company's physical address using the details provided in this PAIA Manual.

9.1.5. Please ensure the completed Form 2 Request for Access to Record in terms of Section 53 of PAIA:

- contains enough information for the information officer to identify you (the requestor) and the record/s requested;
- includes the form of access you require, if your request is granted;
- specifies your telephone number, e-mail address and postal address in South Africa;
- specifies the right you seek to exercise or protect and explains why you need the requested record to exercise or protect that right;
- states whether you would like to be informed of our decision to grant or refuse access to the record/s other than in writing;
- provides proof, to the satisfaction of the information officer, that you are authorised to make the request on behalf of another person.

9.1.6. If you are unable to complete Form 2 Request for Access to Record in terms of Section 53 of PAIA due to illiteracy or disability, you may make the request orally. The information officer will confirm the oral request in writing and provide you with a copy.

9.2. Prescribed Request Fees

9.2.1. Your request (other than requests relating to personal information in terms of section 23 of POPIA and paragraph 10.7 of this PAIA Manual) must be accompanied by proof of payment of the prescribed request fee, as set out in Annexure A of this PAIA Manual. The prescribed request fee is non-refundable.

9.2.2. If the search for and preparation of the record/s requested will require more than the prescribed 6 (six) hours, you will be required to pay the Company a deposit of not more than one third of the access fee which will be payable if the request is granted.

9.2.3. The Company is entitled to withhold the processing of your request until you have paid the prescribed fees and deposit, if applicable.

9.3. Decision

9.3.1. Once the Company has received a fully completed and signed Form 2 Request for Access to Record in terms of Section 53 of PAIA and payment of the prescribed request fees, the information officer will process your request for access to record/s and notify you in writing whether your request has been granted or denied within 30 (thirty) calendar days.

9.3.2. The information officer may extend the period of 30 (thirty) days once for a further period of 30 (thirty) days if your request is for a large amount of information or if the Company's search for the requested record/s will take longer than the initial; period of 30 (thirty) days.

9.3.3. If the information officer fails to give the decision on a request within the prescribed period, the information officer is deemed to have refused the request.

9.3.4. If the information officer cannot find the record/s requested or if the requested record/s do not exist, the information officer will notify you that it is not possible to grant you access to the record/s requested.

9.4. Grounds For Refusal

- 9.4.1. The Company may refuse access to records to protect:
- the privacy of a third party who is a natural person;
 - the commercial information of a third party or the Company;
 - the confidential information of a third party;
 - the safety of individuals and protection of property;
 - records privileged from production in legal proceedings; or
 - the commercial information of the Company;
 - research information of a third party or of the Company.

9.4.2. Requests for information that are clearly frivolous or vexatious will be refused.

9.5. **Prescribed Access Fees**

9.5.1. If the information officer grants your request for access to record/s, the information officer will notify you of the prescribed access fees, as set out in Annexure A, that you will be required to pay before you can access the record/s.

9.5.2. The Company is entitled to withhold access to record/s until you have paid the prescribed access fees.

9.6. **Remedies**

If your request for access is denied you may:

9.6.1. apply to a court with appropriate jurisdiction; or

9.6.2. lodge a complaint with the Regulator,

for the necessary relief within 30 (thirty) calendar days after the Company has notified you that your request for access has been denied.

10. **PROCESSING AND PROTECTION OF PERSONAL INFORMATION**

10.1. **Categories of Persons**

The Company processes personal information of various categories of persons, including:

- 10.1.1. customers or clients;
- 10.1.2. employees;
- 10.1.3. contractors, vendors, suppliers and service providers;
- 10.1.4. sellers and purchasers;
- 10.1.5. debtors and creditors.

10.2. **Purposes**

The Company processes the personal information to:

- 10.2.1. supply its products and provide its services to customers and clients;
- 10.2.2. employee recruitment and administration;
- 10.2.3. keep data subject records updated;
- 10.2.4. manage records;

- 10.2.5. manage customers and clients in general;
- 10.2.6. transact with contractors, vendors, suppliers and service providers;
- 10.2.7. process customer requests or complaints;
- 10.2.8. general administration;
- 10.2.9. financial requirements and debt collection;
- 10.2.10. compliance with legal and regulatory requirements.

10.3. Categories of Personal Information

The categories of personal information processed by the Company include:

- 10.3.1. full names and surnames, and identity numbers of individuals;
- 10.3.2. registered names, registration numbers, VAT numbers of companies;
- 10.3.3. contact details, including phone numbers, physical and postal addresses, and e-mail addresses;
- 10.3.4. proof of physical address, e.g. utility bill;
- 10.3.5. banking details and/or credit card details;
- 10.3.6. background information, gender and race of employees;
- 10.3.7. Certificate of Registration in Respect of Motor Vehicle, issued by eNaTIS, confirming registration, ownership and titleholder (if applicable) of the vehicle;
- 10.3.8. roadworthy certificate;
- 10.3.9. licence disc.

10.4. Third Party Disclosures

The Company gives personal information that it processes to the following people to fulfil its obligations to its customers, clients and employees:

- 10.4.1. contractors, vendors, suppliers and service providers;
- 10.4.2. operators, other responsible parties, or co-responsible parties;
- 10.4.3. third party vendors/contractors to help us maintain our services.

10.5. Cross-border Transfers

The Company processes personal information within South Africa. The Company will only transfer personal information to other countries who have similar data protection and privacy laws to South Africa, or to recipients who can guarantee the protection of personal information to the same standard required by the Company.

10.6. Security

The Company secures personal information by maintaining reasonable measures to protect personal information from loss, misuse, and unauthorised access, disclosure, alteration and destruction. The Company also takes reasonable steps to keep personal information accurate, current, complete, confidential and reliable for its intended use.

10.7. Objection, Correction or Deletion Requests

- 10.7.1. A person (data subject) has the right to request the Company (responsible party) to confirm, free of charge, whether or not it holds personal information about the person (data subject).

- 10.7.2. A person may be required to pay a fee to enable the Company to respond to the request.
- 10.7.3. The Company may, or must, as the case may be, refuse to disclose any personal information requested on the grounds set out in paragraph 9.4 of this PAIA Manual.
- 10.7.4. Upon receipt of the personal information requested, a person may:
- take no further action;
 - object to the processing of their personal information by submitting a completed and signed Form 1 Objection to the Processing of Personal Information in terms of Section 11(3) of POPIA;
 - request for correction or deletion of their personal information or destruction or deletion of a record of personal information by submitting a completed and signed Form 2 Request for Correction or Deletion of Personal Information or Destroying or Deletion of Record of Personal Information in terms of Section 24(1) of POPIA.
- 10.7.5. All requests must provide sufficient and detailed information and be addressed to the information officer.

11. AVAILABILITY OF THE MANUAL

11.1. A copy of this PAIA Manual is available in English:

- 11.1.1. on the Company's website (www.torquetrader.co.za);
- 11.1.2. at the Company's business address for public inspection during normal business hours;
- 11.1.3. to any person upon request and upon the payment of a reasonable prescribed fee; and
- 11.1.4. to the Information Regulator upon request.

11.2. 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.

12. UPDATING OF THIS PAIA MANUAL

This PAIA Manual will be updated as required by law or to make any material changes to the current information in this PAIA Manual.

ANNEXURE A

PRESCRIBED FEES

The prescribed request and access fees for all requests for access to records in terms of PAIA are published in the relevant Regulations under PAIA. Therefore, the prescribed request and access fees set out in this Annexure A will be subject to any amendments to the prescribed request and access fees published in the relevant Regulations under PAIA.

Item	Description	Amount
1.	The request fee payable by every requestor	R140.00
2.	Photocopy/printed black & white copy of A4-size page	R2.00 per page or part thereof
3.	Printed copy of A4-size page	R2.00 per page or part thereof
4.	For a copy in a computer-readable form on: (i) Flash drive (to be provided by the requestor) (ii) Compact disc <ul style="list-style-type: none"> • If provided by requestor • If provided to the requestor 	R40.00 R40.00 R60.00
5.	For a transcription of visual images per a4-size page	Service to be outsourced. Will depend on quotation from service provider.
6.	Copy of visual images	
7.	Transcription of an audio record, per A4-size page	R24.00
8.	Copy of an audio record on: (iii) Flash drive (to be provided by the requestor) (iv) Compact disc <ul style="list-style-type: none"> • If provided by requestor • If provided to the requestor 	R40.00 R40.00 R60.00
9.	To search for and prepare the record for disclosure for each hour or part thereof, excluding the first hour, reasonably required for such search and preparation. To not exceed a total cost of:	R145.00 R435.00
10.	Deposit if search exceeds 6 hours	One third of the amount per request calculated in terms of Items 2 to 8, inclusive.
11.	Postage, e-mail or any other electronic transfer	Actual expenses, if any.

FORM 2
REQUEST FOR ACCESS TO RECORD
 [Regulation 7 of PAIA]

Note:

1. Proof of the requestor's identity must be attached to this form.
2. If requests are made on behalf of another person, proof of such authorisation must be attached to this form.

TO: The Information Officer

(Address)

Email Address: _____

Mark with an "X":

Request is made in my own name

Request is made on behalf of another person

PERSONAL INFORMATION				
Full names and surname:				
Identity number/ Passport number:				
Capacity in which request is made <i>(when made on behalf of another person)</i> :				
Postal address:				
Street address:				
Email address:				
Contact number(s):	Work:		Home:	
	Cellular:		Facsimile:	
Full names and surname of person on whose behalf request is made <i>(if applicable)</i>				
Identity number/ Passport number:				
Postal address:				
Street address:				
Email address:				
Contact number(s):	Work:		Home:	
	Cellular:		Facsimile:	
PARTICULARS OF RECORD REQUESTED				
<i>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. (If the provided space is inadequate, please continue on a separate page and attach it to this form. The requestor must sign all additional pages.)</i>				
Description of record or relevant part of record:				
Reference number, if available:				
Any further particulars of record:				
TYPE OF RECORD				
<i>(Mark the applicable box with an "X")</i>				
Record is in written or printed form				
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)</i>				

Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	
FORM OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

MANNER OF ACCESS <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal service to postal address	
Postal service to street address	
Courier service to street address	
Email of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language: <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED <i>If the provided space is inadequate, please continue on a separate page and attach it to this form. The requestor must sign all additional pages.</i>	
Indicate which right/s is/are to be exercised or protected:	
Explain why the record requested is required for the exercise or protection of the aforementioned right:	

FEES	
<p>a) A request fee must be paid before the request will be considered.</p> <p>b) You will be notified of the amount of the access fee to be paid.</p> <p>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.</p> <p>d) If you qualify for exemption of the payment of any fee, please state the reason for exemption.</p>	
Reason:	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address <i>(Please specify)</i>	Facsimile <i>(Please specify)</i>	E-mail address <i>(Please specify)</i>

Signed at _____ on this _____ day of _____ 20_____

Signature of requestor/person on whose behalf request is made

FOR OFFICIAL USE ONLY

Reference number:	
Request received by: <i>(state position, name and surname of Information Officer)</i>	
Date received:	
Access fees:	
Deposit (if any):	

Signature of information officer

FORM 1

**OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3)
OF POPIA**

[Regulation 2 of POPIA]

Note:

1. Affidavits or other documentary evidence as applicable in support of the objection may be attached.
2. If the space provided for in this Form 1 is inadequate, submit information as an Annexure to this Form 1 and sign each page.
3. Complete as is applicable.

A	DETAILS OF DATA SUBJECT
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number:	
Residential, postal or business address:	
	Code:
Contact Number(s):	
Fax Number:	
Email address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname / Registered Name of Responsible Party:	
Residential, postal or business address:	
	Code:
Contact Numbers:	
Fax Number / Email address:	
C	REASONS FOR OBJECTION IN TERMS OF SECTIONS 11(1)(d) to (f) <i>(Please provide detailed reasons for the objection)</i>

Signed at _____ on this _____ day of _____ 20__

Signature of Data Subject/Designated Person

FORM 2
REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING
OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF
POPIA

[Regulation 3 of POPIA]

Note:

1. Affidavits or other documentary evidence as applicable in support of the objection may be attached.
2. If the space provided for in this Form 2 is inadequate, submit information as an Annexure to this Form 2 and sign each page.
3. Complete as is applicable.

Mark the appropriate box with an "X".

Request for:

- Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.
- Destroying or deletion of a record of personal information about the data subject which is in the possession or under the control of the responsible party and who is no longer authorised to retain the record of information.

A	DETAILS OF THE DATA SUBJECT
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number:	
Residential, postal or business address:	
	Code:
Contact Number(s):	
Fax Number:	
Email address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname/ registered name of responsible party:	
Residential, postal or business address:	
	Code:
Contact Number(s):	
Fax Number:	
Email address:	
C	INFORMATION TO BE CORRECTED/DELETED/DESTROYED
REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a) OF POPIA WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY; and/or	

