

Afrivet Business Management (PTY) Limited

PAIA Manual

What is PAIA?

The Promotion of Access to Information Act, 2000 (“**PAIA**”) was enacted to allow persons to access information held by the State and certain private bodies to exercise, or protect, their rights.

The Information Regulator, established pursuant to the Protection of Personal Information Act, 2013 (“**POPIA**”), has published a helpful guide to assist a person on how to access his or her personal information in terms of the POPIA. The guide is available in all official South African languages at <https://inforegulator.org.za/paia-guidelines>

To help you interpret and understand this PAIA Manual, capitalised words shall have the meanings given to them in the POPIA, unless the context clearly indicates otherwise.

What is a PAIA Manual?

In terms of the PAIA, all public and private bodies are required to have a PAIA Manual. A PAIA Manual is a document that explains what information is held by the private body and how you may access that information. In terms of section 17 of the POPIA, a Responsible Party must maintain the documentation of all Processing operations under its responsibility, as referred to in section 51 of the PAIA. This PAIA Manual is in compliance with this obligation in the POPIA.

This PAIA Manual is for Afrivet Business Management (Pty) Limited and its parent and subsidiary companies (“**Afrivet**”) and all information that you may require of it, is described in this document.

You may follow the Information Regulator’s guide on who to request this information, as per the link provided above.

What is the purpose of a PAIA Manual?

The purpose of a PAIA Manual is accordingly to provide:

- a) a description of the categories of records held by a private body which are available without having to submit a formal PAIA request for access to information to that private body in terms of the PAIA;
- b) a description of the subjects on which the private body holds records, and the categories of records held on each subject;
- c) information of the records of the private body which are available in accordance with any other legislation;

- d) the contact details of the Information Officer and Deputy Information Officer(s), who will assist the public with the records they intend to access;
- e) information regarding the private body's Processing of Personal Information;
- f) a description of the categories of Data Subjects;
- g) the recipients, or categories of recipients to whom the Personal Information may be supplied;
- h) information regarding the private body's plans 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;
- i) information regarding the private body's security measures to ensure the confidentiality, integrity and availability of the Personal Information which is to be processed.

Company overview

Afrivet is a company that distributes animal health products, knowledge solutions and services for animal owners, farmers, and veterinarians in Africa. It is part of the Bimeda Group, a leading global manufacturer, marketer and distributor of animal health products and veterinary pharmaceuticals.

Key Contact Details for Access to Information of Afrivet

Company Information	
Registered Name	Afrivet Business Management (Pty) Ltd
Registration Number	2000/011263/07
Registered Office	Stand 21, Newmark Estate, Silver Lakes Road, Gauteng, South Africa, 0054
Email	admin@afrivet.co.za
Chief Information Officer	
Name	Mr Anton Lessing
Telephone Number	+27 (0) 12 817 9060
Email Address	anton.lessing@afrivet.co.za
Deputy Information Officer	
Name	Anathi Toki

Telephone Number	+27 (0) 12 817 9060
Email Address	anathi.toki@afrivet.co.za

Categories of Records

We set out below the categories of records of Afrivet which are available without a person having lodge a formal request for information pursuant to PAIA. You will see that we hold different categories of information in our records, but there is some information we cannot share with you, which may be confidential.

Category of Records	Description of Records	Confidential
Company Records	Incorporation documents Shareholder and director information as per the Companies Act, 2008	
Financial Records	Accounting documents (financial statements and accounting records) Banking records Invoices sent to customers Invoices received from service providers and suppliers	X
Tax Records	Tax returns Records related to PAYE, VAT, UIF and SDL	X
Employee Records	Employment contracts Copies of identity documents Salary records	X

	Leave records	
Customer Records	FICA information Invoices and billing statements sent to customers	X

Records of Afrivet which are available in accordance with any other legislation

Category of Records	Applicable Legislation
Memorandum of Incorporation	Companies Act, 2008
PAIA Manual	Promotion of Access to Information Act, 2000

Personal Information

We process the personal information that is contained in our records in accordance with POPIA.

Purpose of Processing Personal Information

We process Personal Information of our suppliers and our customers in accordance with section 11(1)(b) of the POPIA, because Processing this Personal Information is necessary to carry out actions for the conclusion or performance of a contract to which the data subject is a party.

We also Process the Personal Information of our employees for business and employment purposes as required from us in terms of the Basic Conditions of Employment Act, 1997 and the Labour Relations Act, 1995. This is in accordance with section 11(1)(c) of the POPIA, because our Processing this Personal Information of our employees is to comply with an obligation imposed by law on us, in our capacity as the Responsible Party.

Description of the categories of Data Subjects and of the Personal Information or categories of Personal Information

Category of Data Subjects	Personal Information that may be processed
Customers	name, address, registration numbers or identity numbers, employment status and bank details
Service Providers / Suppliers	name, registration number, VAT number (where applicable), physical address and bank details
Employees	Name, identity number, home address, emergency contact details, qualifications, gender and race

Recipients to whom the Personal Information may be supplied

We only Process the Personal Information of our customers, suppliers and employees for operational reasons.

Recipients of Personal Information	Category of Personal Information
South African Revenue Service Department of Labour Credit Bureaux	Employee's Personal Information
J.S Jacobs and Associates Inc.	Client, employee and service providers' personal information
South African Revenue Service	Tax and VAT information of clients, employees and service providers

Credit Bureaux	Service provider name(s), registration number(s) and address
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Planned transborder flows of personal information

Afrivet provides the Personal Information to its holding company in the Republic of Ireland for accounting, marketing and general business purposes.

In terms of section 72 of the POPIA, a Responsible Party in South Africa may not transfer Personal Information about a Data Subject to a third party who is in a foreign country unless it has complied with the requirements of section 72. In accordance with section 72(1)(a) of the POPIA, Afrivet has determined that Bimeda Group is:

- subject to a law which provides an adequate level of protection that effectively upholds principles for reasonable processing of the personal information that are substantially similar to the conditions for the lawful processing of personal information relating to a data subject who is a natural person and, where applicable, a juristic person; and
- includes provisions, that are substantially similar to this section, relating to the further transfer of personal information from the recipient to third parties who are in a foreign country.

The Republic of Ireland is subject to the General Data Protection Regulation 2016/679, which is considered to provide an adequate level of protection for Personal Information.